

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

iHeartMedia, Inc.

Petition for Declaratory Ruling Under Section
310(b)(4) of the Communications Act of 1934,
as Amended

)
)
) Docket No. _____
)
)
)
)
)
)
)
)

PETITION FOR DECLARATORY RULING

Eve Klindera Reed
Gregory L. Masters
Wiley Rein LLP
1776 K Street, NW
Washington, DC 20006
202.719.7000

Attorneys for iHeartMedia, Inc.

July 25, 2019

TABLE OF CONTENTS

I.	INTRODUCTION AND SUMMARY.....	1
II.	THE CIRCUMSTANCES PROMPTING THE FILING OF THE PETITION AND IHEART'S CURRENT FOREIGN OWNERSHIP	2
III.	THE PROPOSED FOREIGN OWNERSHIP IS CONSISTENT WITH COMMISSION PRECEDENT AND THE PUBLIC INTEREST	9
A.	Standard of Review.....	9
B.	Proposed Foreign Ownership	10
C.	Public Interest Analysis.....	14
1.	Grant of the Petition Will Improve iHeart's Ability to Compete and Innovate.....	14
2.	Grant of the Petition Will Serve the Commission's Interest in Encouraging Foreign Investment in Broadcasting and Ensure Comity with the Bankruptcy Laws.	17
3.	Grant of the Petition Will Further U.S. Trade Policy Without Raising any National Security, Law Enforcement, or other Risks.	20
IV.	CONCLUSION	25

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

iHeartMedia, Inc.

Petition for Declaratory Ruling Under Section
310(b)(4) of the Communications Act of 1934,
as Amended

)
)
) Docket No. _____
)
)
)
)
)
)
)

PETITION FOR DECLARATORY RULING

I. INTRODUCTION AND SUMMARY

iHeartMedia, Inc. (“iHeart”), by its attorneys, respectfully submits this petition (“Petition”) requesting that the Federal Communications Commission (“FCC” or “Commission”) issue a declaratory ruling to allow iHeart to have foreign investment in excess of the 25 percent benchmark contained in Section 310(b)(4) of the Communications Act of 1934, as amended (the “Communications Act”).¹ Specifically, iHeart, which is the indirect parent company of multiple companies that hold broadcast radio and other FCC licenses, seeks a ruling permitting up to 100 percent aggregate foreign investment (voting and equity) in iHeart.² In addition, iHeart requests

¹ 47 U.S.C. § 310(b)(4).

² See 47 C.F.R. § 1.5000(a)(1); see also *id.* §§ 1.5000(c)(2), 1.5004(f)(3). Exhibit A contains a list of iHeart’s subsidiaries that hold broadcast licenses and the information required by Section 1.5001(a)-(c) of the Commission’s rules with respect to iHeart and each such subsidiary. Certain of these subsidiaries and other iHeart subsidiaries hold wireless and satellite authorizations. Information concerning those authorizations (and the subsidiaries that hold only wireless and/or satellite authorizations) is not included in Exhibit A because those authorizations are not subject to Section 310(b) of the Communications Act. 47 U.S.C. § 310(b) (imposing foreign ownership limitations on holders of “broadcast or common carrier or aeronautical en route or aeronautical fixed radio station license[s]”). Exhibit B contains information concerning the direct and indirect

specific approval for certain foreign investors that seek to directly or indirectly hold more than 5 percent or 10 percent, as applicable, of iHeart's equity and voting rights. As described more fully below, approval of the proposed foreign investment in iHeart will serve the public interest by enabling iHeart to better compete in the already diverse and ever-expanding media marketplace, incentivizing foreign investment in broadcasting, and promoting U.S. trade policy by encouraging reciprocal investment opportunities for U.S. companies in foreign markets, while avoiding any risks to national security, law enforcement, or foreign or trade policy.

II. THE CIRCUMSTANCES PROMPTING THE FILING OF THE PETITION AND IHEART'S CURRENT FOREIGN OWNERSHIP

Among other lines of business, iHeart, through wholly owned subsidiaries, owns 857 full-power broadcast radio stations pursuant to licenses issued by the FCC. Following a series of capital market transactions and extensive negotiations with its creditors regarding restructuring alternatives, iHeart and all of its subsidiaries that hold broadcast licenses filed petitions for relief under Chapter 11 of Title 11 of the United States Bankruptcy Code (the "Bankruptcy Petitions") on March 15, 2018.³ The United States Bankruptcy Court for the Southern District of Texas (the

attributable interest holders of iHeart as required by Section 1.5001(e), (f), and (g)(2) of the Commission's rules, as well as the attributable interest holders of its subsidiaries that hold broadcast licenses. Exhibit C contains an ownership diagram that illustrates the vertical ownership structure of iHeart's subsidiaries that hold broadcast licenses as required by Section 1.5001(h)(2) of the Commission's rules. Exhibit D contains information concerning each holder of indebtedness claims of iHeart prior to its emergence from bankruptcy that received more than 1 percent of the total amount of Class A Common Stock, Class B Common Stock, and Special Warrants (each share of common stock or Special Warrant a "Unit") issued at iHeart's emergence. The aggregate number of Units held by the entities listed in Exhibit D represents more than 75 percent of the total outstanding Units as of the emergence date. Identifying information has been redacted from the public version of Exhibit D, and an unredacted confidential version is being separately submitted to the Media Bureau with an accompanying request for confidentiality.

³ As noted above, Exhibit A contains a list of these subsidiaries and the broadcast licenses that they hold, and Exhibit C contains an ownership diagram illustrating the proposed post-

“Bankruptcy Court”) confirmed iHeart’s Modified Fifth Amended Plan of Reorganization (the “Plan”) on January 22, 2019.

Pursuant to the FCC’s grant of applications requesting consent to the assignments and transfers of control associated with iHeart’s reorganization pursuant to the Plan,⁴ iHeart consummated the Plan and emerged from bankruptcy on May 1, 2019. In connection with its emergence from bankruptcy, and as set forth in the Emergence Applications, iHeart took steps to ensure compliance with the 25 percent foreign ownership benchmark, as well as other Communications Act and FCC regulatory restrictions on ownership.⁵ Specifically, pursuant to the Plan, iHeart issued the following securities to certain debtholders, equity holders, and other creditors: (i) new common stock, including voting Class A Common Stock and/or limited voting Class B Common Stock, and/or (ii) Special Warrants, which are exercisable for common stock of iHeart subject to certain conditions, including compliance with the Communications Act and the FCC’s rules (the common stock and the Special Warrants, collectively, the “New Securities”).⁶

declaratory ruling vertical ownership structure of these subsidiaries. In addition to the iHeart broadcast licensee subsidiaries that filed voluntary petitions for bankruptcy, an iHeart subsidiary – AMFM Broadcasting, Inc. – is the controlling 51 percent member of Los Angeles Broadcasting Partners, LLC (“LABP”), the licensee of radio station KLAC(AM), Los Angeles, California. LABP did not file a voluntary petition for bankruptcy, but is among the broadcast licensees covered by the instant Petition and is thus included in Exhibits A and C.

⁴ See FCC File Nos. BALH-20181009AAX, BALH-20181009AEM, BALH-20181009AEV, BALH-20181009ARH, BALH-20181009AZD, BALH-20181009BET, BALH-20181009BGM, BTC-20181009BES (the “Emergence Applications”). The FCC granted the Emergence Applications on April 24, 2019. See *iHeartMedia, Inc., Debtor-in-Possession Seeks Approval to Transfer Control of and Assign FCC Authorizations and Licenses*, Memorandum Opinion and Order, DA 19-322 (rel. Apr. 24, 2019) (“Approval Order”).

⁵ See Emergence Applications, Amended Comprehensive Exhibit, at 5-6.

⁶ See *id.* As explained in the Emergence Applications, the Class B Common Stock has no rights to vote on iHeart’s directors and is intended to be nonattributable for purposes of the FCC’s media ownership and attribution rules and policies. See *id.* at 3-4. The Special Warrants

In order to determine the proper allocation of the New Securities and ensure FCC compliance, iHeart required each holder of a claim or interest entitling it to a distribution of New Securities to submit a certification to iHeart as to the amount of the claim or interest holder's own foreign ownership, both as a percentage of voting rights and of equity.⁷ iHeart utilized these certifications to determine the extent to which it needed to issue Class B Common Stock and/or Special Warrants to claim or interest holders with foreign ownership in order to ensure that iHeart's aggregate foreign voting and equity percentages did not exceed 22.5 percent at emergence. Upon iHeart's emergence from bankruptcy, it was therefore in compliance with the 25 percent ownership benchmark.

Prior to emergence, iHeart's Class A Common Stock was registered with the Securities and Exchange Commission ("SEC") under Section 12(g) of the Exchange Act of 1934, as amended (the "Exchange Act"). Upon emergence, pursuant to Rule 12g-3(a) of the Exchange Act, iHeart's new Class A Common Stock was deemed registered under Section 12 of the Exchange Act by operation of law. As a result, since iHeart's emergence, the Exchange Act has required beneficial owners of more than 5 percent of iHeart's Class A Common Stock to report their holdings on Schedules 13D or 13G within the time periods established by SEC rules.⁸ In addition, upon its emergence, iHeart's common stock was deposited with the Depository Trust

similarly have no voting rights, are convertible instruments that by their terms may be exercised only if exercise will be consistent with the Communications Act, and are not intended to confer any current equity interests. The Special Warrants are also consistent with instruments that the Commission has previously approved for purposes of ensuring compliance with Section 310(b) of the Communications Act. *See id.* at 3-4, 6; *see also Approval Order*, ¶ 2.

⁷ These certifications were required pursuant to procedures approved by the Bankruptcy Court. *See Emergence Applications, Amended Comprehensive Exhibit*, at 6.

⁸ iHeart's common stock is not currently included in the SEC's list of "section 13(f) securities" and is thus not subject to SEC Form 13F reporting requirements.

Company (“DTC”) and has since that time been subject to DTC’s SEG-100 program, under which iHeart receives periodic reports regarding the extent to which shares of its common stock are held in segregated accounts designated for foreign-owned shares.⁹ iHeart also recently listed its Class A Common Stock on the NASDAQ Global Select Market, leaving the SEC filing obligations and SEG-100 participation discussed above in place.¹⁰

Although the Plan, as discussed above, included mechanisms to ensure iHeart’s compliance with the 25 percent foreign ownership and equity benchmarks at emergence, the Plan also provides that iHeart will seek a declaratory ruling that authorizes foreign ownership above those benchmarks.¹¹ The grant of a declaratory ruling will enable foreign-owned and/or -organized entities that currently hold Special Warrants to exercise those warrants for Class A

⁹ See *id.* ¶¶ 55-56. The Equity Allocation Mechanism (“EAM”) contained in the approved Plan also specifies that, between iHeart’s emergence from bankruptcy protection and the date on which the FCC grants a declaratory ruling, only parties that certify that their foreign ownership, as calculated in accordance with FCC rules, is zero percent, can exercise Special Warrants for stock. See Plan, Exhibit A, § B.5 (any holder of Special Warrants “that is a Non-U.S. Holder shall not be permitted to exercise Special Warrants” prior to the date upon which Special Warrants are exchanged following issuance of a declaratory ruling); see also *id.* §§ B.2(a)(i) (defining “U.S. Holder”), § B.2.(b)(i) (defining “Non-U.S. Holder”). In addition, iHeart’s Fifth Amended Certificate of Incorporation contains provisions permitting the company to take various actions to ensure FCC compliance, and iHeart’s common stock certificate contains a legend explaining that the stock is subject to such provisions. See *Review of Foreign Ownership Policies for Broadcast, Common Carrier and Aeronautical Radio Licensees under Section 310(b)(4) of the Communications Act of 1934, as Amended*, Report and Order, 31 FCC Rcd 11272, ¶ 77 (2016) (“2016 Foreign Ownership Order”); see also Exhibit E, which contains the information required by 47 C.F.R. § 1.5001(h)(1).

¹⁰ See Press Release, iHeartMedia, Inc., *iHeartMedia Announces It Has Been Approved for Listing on the NASDAQ Global Select Market* (June 28, 2019), <https://iheartmedia.com/press/iheartmedia-announces-it-has-been-approved-listing-nasdaq-global-select-market>; iHeartMedia, Inc., SEC Form 8-A (July 17, 2019); Press Release, iHeartMedia, Inc., *iHeartMedia to Ring the NASDAQ Stock Market Opening Bell* (July 18, 2019), <https://iheartmedia.com/press/iheartmedia-ring-nasdaq-stock-market-opening-bell>.

¹¹ See Plan Art. IV, § J; EAM § B.2(b)(iii).

Common Stock and/or Class B Common Stock. The agreement governing the Special Warrants sets forth procedures for an exchange of Special Warrants for iHeart common stock following the Commission’s issuance of a declaratory ruling, consistent with that ruling and all other FCC rules, including the requirement to obtain specific approval for foreign individuals, entities, or groups whose ownership would exceed 5 percent or 10 percent, as applicable (such exercise pursuant to such procedures, the “Exchange”).¹²

In connection with its foreign ownership monitoring efforts following emergence from bankruptcy, iHeart learned of an unforeseen and unforeseeable development with respect to an iHeart Class A shareholder that occurred due to matters wholly outside of iHeart’s control. Specifically, iHeart learned of a transaction in which Invesco Ltd. (“Invesco”), a limited company organized under the laws of Bermuda with exempted status, acquired OppenheimerFunds, Inc. (“Oppenheimer”), the ultimate parent company of the investment adviser of various U.S.-organized mutual funds that collectively received approximately 9.4 percent of iHeart’s Class A Common Stock at emergence. Those funds had been properly treated as having 0 percent foreign voting and 0 percent foreign equity at iHeart’s emergence date based on certifications submitted in the bankruptcy. iHeart has been informed that (1) in connection with Invesco’s acquisition of Oppenheimer, the investment adviser of the Oppenheimer funds holding iHeart stock became Invesco Advisers, Inc. (“IAI”), a Delaware corporation; (2) as the investment adviser, IAI makes the investment decisions for the funds and votes the shares held by the funds; (3) IAI’s ultimate parent is Invesco, a limited company organized under the laws of Bermuda with exempted status; and (4) this unforeseen change in the investment adviser to the Oppenheimer funds did not involve a change in the funds’ equity

¹² See EAM § B.5(c).

ownership. iHeart was not informed of the Invesco/Oppenheimer transaction prior to its occurrence, was not otherwise aware of that transaction, and would not have had any ability to prevent it from occurring under any circumstances.¹³ Promptly after learning and confirming occurrence of the transaction, iHeart informed the FCC of this development by letter dated July 3, 2019.¹⁴ The FCC responded on July 9, 2019, indicating that it had not determined that the change in the Oppenheimer funds' investment adviser is contrary to the public interest and deeming iHeart to be in compliance with the FCC's foreign ownership reporting rules pending receipt and processing of the instant Petition.¹⁵

Based on information concerning the ownership of its common stock and warrants as of emergence and taking into account the Invesco/Oppenheimer transaction, iHeart estimates that, if all Special Warrants were exercised, iHeart's aggregate foreign voting percentage would reach approximately 70.5 percent, and its foreign equity percentage would reach approximately 63.9 percent.¹⁶ Because the Special Warrants (as well as iHeart's common stock) are subject to

¹³ See 47 C.F.R. § 1.5004(f)(3)(ii).

¹⁴ See *id.* § 1.5004(f)(3)(i).

¹⁵ Based upon this exchange of letters and Section 1.5004(f)(3)(iii) of the Commission's rules, iHeart has not taken remedial action pursuant to its Certificate of Incorporation with respect to the Invesco holdings. See *supra* n.9; see also 47 C.F.R. 1.5004(f)(3)(iii).

¹⁶ These percentages were calculated by iHeart's advisors. The percentage for foreign voting differs from the percentage for foreign equity for three reasons. *First*, certain holders received Class B Common Stock, which is non-voting for FCC purposes and is included only in the total equity percentage, in lieu of Class A Common Stock (which is included in both the voting and equity percentage), to ensure that they remained non-attributable under the FCC's media ownership rules and that iHeart's aggregate foreign voting percentage did not exceed 22.5 percent at emergence. *Second*, as noted above, iHeart has been informed that the Invesco/Oppenheimer transaction impacted iHeart's aggregate foreign voting percentage, but not its foreign equity percentage. *Third*, at iHeart's emergence, one of its wholly owned indirect subsidiaries, iHeartOperations, Inc., issued preferred stock carrying no current voting rights and intended to represent approximately 2 percent of the total equity of iHeartOperations, Inc. at that

ongoing trading, however, iHeart does not have full visibility into the identities of its warrant holders prior to the Exchange, and thus iHeart's aggregate foreign equity and voting percentages upon completion of the Exchange could vary from its current estimate.¹⁷ In addition, iHeart seeks flexibility to take on additional foreign investment in order to maximize its access to capital and to promote the free transferability of its stock. iHeart is, accordingly, filing the instant Petition requesting a declaratory ruling to authorize up to 100 percent aggregate foreign investment (voting and equity) in iHeart.¹⁸

In addition, iHeart seeks specific approval under Section 1.5001(i) of the rules¹⁹ for two sets of foreign entities to hold more than 5 percent or 10 percent, as applicable, of iHeart's voting and/or equity interests. First, the exercising warrant holders in an Exchange are expected to include Pacific Investment Management Company LLC, on behalf of certain funds and/or accounts managed by it and its affiliates (together with such managed funds and accounts, "PIMCO"). PIMCO is ultimately controlled by German-organized Allianz SE ("Allianz"). Because the exercise of Special Warrants held by PIMCO would cause Allianz and certain other foreign entities within PIMCO's organizational structure to indirectly hold, in the aggregate, a percentage of iHeart's equity and/or voting interests requiring specific approval, iHeart is requesting specific approval for those foreign entities to indirectly hold up to a 19.99 percent

time to an entity treated as 100 percent foreign. As shown in Exhibit C-1, iHeartOperations, Inc. is the direct or indirect parent of iHeart's broadcast licensee subsidiaries. Thus, the amount of iHeart equity issued to foreign individuals was adjusted downwards in order to account for the preferred stock issuance and ensure that the direct and indirect foreign ownership of those subsidiaries remained below 22.5 percent.

¹⁷ See *2016 Foreign Ownership Order*, ¶ 35 (recognizing the "difficulties of ascertaining the identity and citizenship of widely dispersed public company shareholders").

¹⁸ See *id.* ¶ 15.

¹⁹ 47 C.F.R. § 1.5001(i).

voting interest and a 32.99 percent equity interest in iHeart.²⁰ Second, Invesco has requested that iHeart seek specific approval to permit Invesco and other foreign-organized entities within its corporate organizational structure to hold up to a 19.99 percent voting and equity interest in iHeart.²¹ Other than these entities, iHeart has, as of the date of this filing, identified no foreign entity or group of foreign entities requiring specific approval under the FCC's rules.²²

III. THE PROPOSED FOREIGN OWNERSHIP IS CONSISTENT WITH COMMISSION PRECEDENT AND THE PUBLIC INTEREST

A. Standard of Review

Under the revised foreign ownership rules adopted in 2016, the FCC reviews requests by broadcast licensees to exceed the Communications Act's 25 percent indirect foreign ownership benchmark under the same streamlined standard that had historically applied to common carriers.²³ Specifically, under Section 310(b) and the FCC's rules, the agency will approve indirect foreign ownership of broadcast licensees above 25 percent "unless the Commission finds that the public interest will be served by refusing to permit such foreign ownership."²⁴ Under the plain language of the statute, the FCC need not make an affirmative finding that the public interest will be served to grant a petition for declaratory ruling to exceed the Section 310(b)(4)

²⁰ See *id.* §§ 1.5001(i), 1.5001(k)(2).

²¹ See *id.* § 1.5001(k)(2).

²² See *id.* § 1.5001(i). It is possible that one or more additional PIMCO-related entities or individuals may also require specific approval. To the extent that iHeart learns that to be the case, it will promptly supplement the instant Petition with the information required by the FCC's rules concerning any such entities or individuals.

²³ See *2016 Foreign Ownership Order*, ¶ 11.

²⁴ 47 C.F.R. § 310(b)(4); see *2016 Foreign Ownership Order*, ¶ 5; see also, e.g., *Grupo Multimedia LLC*, Declaratory Ruling and Memorandum Opinion and Order, 33 FCC Rcd 4465, ¶ 4 (2018).

benchmarks but, instead, is obligated to grant such a petition unless it finds that denial will serve the public interest.

In adopting rules to govern the consideration of broadcaster parent company requests for approval of up to 100 percent foreign voting and equity, the FCC rightly recognized “the need to provide broadcasters, as well as those seeking to acquire ownership interests in broadcasters, greater clarity and certainty” in an effort to “help improve access to capital from foreign investors and promote regulatory flexibility.”²⁵ Permitting greater foreign investment in broadcast parent companies “has the potential to spur new and increased opportunities for capitalization for broadcasters” which “may in turn yield greater innovation.”²⁶ Further, the FCC has previously determined that affording additional flexibility to structure foreign investments in Commission licensees “will promote U.S. trade policy.”²⁷ As demonstrated below, the declaratory ruling sought herein would further each of these relevant policy objectives without compromising the FCC’s important interests in national security, law enforcement, or foreign and trade policy.

B. Proposed Foreign Ownership

As noted above, the Exchange that is contemplated following the FCC’s grant of a petition for declaratory ruling would likely cause iHeart’s aggregate foreign voting and equity

²⁵ *2016 Foreign Ownership Order*, ¶ 12.

²⁶ *Commission Policies and Procedures Under Section 310(b)(4) of the Communications Act, Foreign Investment in Broadcast Licensees*, Declaratory Ruling, 28 FCC Rcd 16244, ¶ 12 (2013) (“*2013 Broadcast Clarification Order*”).

²⁷ *See, e.g., Review of Foreign Ownership Policies for Common Carrier and Aeronautical Radio Licensees under Section 310(b)(4) of the Communications Act, as Amended*, First Report and Order, 27 FCC Rcd 9832, ¶¶ 2, 21 (2012).

percentages to exceed the 25 percent limitation under Section 310(b)(4).²⁸ Below, we discuss in turn (1) iHeart's proposed foreign ownership in general, and (2) the proposed foreign ownership interests for which iHeart is seeking specific approval. Other than the entities discussed in Section III.B.2 below, iHeart has not identified any other foreign investor or group of investors that will receive a voting or equity interest in iHeart that requires specific approval under the Commission's rules as a result of the Exchange.²⁹ iHeart acknowledges, moreover, that the Commission's grant of the relief requested in this Petition would be subject to the requirement that iHeart obtain specific approval in the future for any new foreign investment in iHeart (or increases in foreign investment by existing investors in iHeart) that would result in any foreign entity holding interests above 5 percent (or above 10 percent for passive investors) other than any investor specifically approved under this Petition.

1. Proposed Foreign Ownership in General

Information concerning the ownership of iHeart's common stock and warrants as of emergence indicates that, if permitted by a declaratory ruling, foreign-owned and/or -organized holders would likely exercise a significant number of Special Warrants in connection with the Exchange. In total, iHeart estimates that its aggregate foreign voting and equity percentages would reach a level well above 50 percent if foreign holders were permitted to freely exercise

²⁸ See EAM, § C. To the extent that the FCC might issue a declaratory ruling authorizing iHeart to have foreign equity and/or voting of between 25 percent and 100 percent, Special Warrants would be automatically exchanged for Class A Common Stock and/or Class B Common Stock in an amount that would comply with the declaratory ruling and any specific approval requirements. See *id.* § C.2.

²⁹ See 47 C.F.R. § 1.5001(i). iHeart intends to utilize ownership certifications that will be required of exercising Special Warrant holders in connection with the Exchange to ensure compliance with applicable FCC requirements, including the requirement to obtain specific approval for named foreign investors or groups of such investors, and any other conditions that the declaratory ruling might impose. See EAM § C.1-3.

their Special Warrants. Accordingly, iHeart seeks a declaratory ruling permitting foreign individuals or entities to hold up to and including 100 percent of its voting rights and up to 100 percent of its equity. Such a ruling is appropriate to afford the company with maximum flexibility to accept foreign investment, which will level the playing field between iHeart and its competitors that are not subject to Section 310(b) and enhance the liquidity of iHeart's stock. These benefits to the company will, in turn, enhance iHeart's ability to compete more effectively by encouraging investment in its business, thus improving its ability to innovate and offer improved programming and service to the public. Such a ruling also will enable iHeart's foreign-owned or -controlled creditors to exercise their warrants, which will maximize their recovery following iHeart's bankruptcy.

2. Specific Approval Request for PIMCO-Related Entities

As a result of the Exchange that is contemplated following the grant of a declaratory ruling, iHeart anticipates that PIMCO, on behalf of its managed funds and accounts, would receive stock in an amount requiring specific approval under the FCC's rules. iHeart is thus seeking specific approval for the foreign entities within PIMCO's corporate structure that are ultimately controlled by Allianz, which is organized in Germany, to indirectly hold a voting and/or equity interest in iHeart that requires specific approval.³⁰ iHeart is working with PIMCO to obtain the information required by Sections 1.5001(i)-(j) of the Commission's rules with respect to the PIMCO-related entities for which specific approval is sought, and will supplement this Petition to provide that information as promptly as practicable.

³⁰ As noted above, *see supra* n.22, it is possible that one or more additional PIMCO-related entities or individuals may also require specific approval. To the extent that iHeart learns that to be the case, it will promptly supplement the instant Petition with the information required by the FCC's rules concerning any such entities or individuals.

3. Specific Approval for Invesco-Related Entities

As a result of the Invesco/Oppenheimer transaction described above, iHeart understands that the Oppenheimer funds that received approximately 9.4 percent of iHeart's Class A Common Stock now have as their investment adviser IAI, a Delaware corporation that is ultimately owned by Invesco, a Bermuda-organized limited company with exempted status, and that IAI controls the right to vote the iHeart shares held by the Oppenheimer funds. iHeart has also been informed that notwithstanding the change in the funds' investment adviser, the funds remain U.S.-organized, and the change did not involve a change in the funds' equity ownership. It is iHeart's understanding that, collectively, the Oppenheimer funds and other funds and client accounts for which a U.S.-organized subsidiary of IAI acts as investment adviser may hold more than 10 percent of iHeart's voting interests, and potentially could hold more than 10 percent of those interests after the Exchange.³¹ Out of an abundance of caution, iHeart is thus seeking specific approval for the foreign entities within Invesco's corporate structure to indirectly hold up to a 19.99 percent voting and equity interest in iHeart.³² iHeart does not anticipate that any other foreign entities within the Invesco corporate structure will individually hold a voting or equity interest requiring specific approval. The information required by Sections 1.5001(i)-(j) of the Commission's rules with respect to the Invesco-related entities for which specific approval is sought is included in Exhibit F.

³¹ These funds and client accounts are subject to the 10 percent threshold for specific approval under the FCC's rules. *See* 47 C.F.R. § 1.5001(i)(3).

³² Although it is anticipated that the funds and client accounts that are advised by Invesco subsidiaries and are organized under the laws of jurisdictions outside of the United States would hold far less than 10 percent of iHeart's equity if all Special Warrants were exchanged for Class A Common Stock, Invesco has requested that iHeart seek approval for Invesco-advised entities to hold an aggregate equity interest of up to 19.99 percent. *See id.* § 1.5001(k)(2).

C. Public Interest Analysis

1. Grant of the Petition Will Improve iHeart's Ability to Compete and Innovate.

As the FCC is aware, iHeart was the subject of a leveraged buyout that closed on the eve of the 2008 financial crisis.³³ In the decade between the consummation of that transaction and the filing of the Bankruptcy Petitions, iHeart and its broadcast competitors encountered significant and unexpected macroeconomic and industry-specific headwinds that limited their ability to generate cash flows, grow their businesses, and satisfy obligations under their capital structures. Among other factors, the global economic downturn that began in 2008 resulted in a decline in advertising and marketing spending by iHeart's customers, which resulted in a corresponding decline in advertising revenues across iHeart's business. Then, as the economy recovered, iHeart and other radio station owners faced new and intense competition from the rapidly-growing internet and digital advertising industry and the entry of on-demand streaming services, both of which siphoned off the share of advertiser revenues allocated by agencies and brands to broadcast radio. As of the end of 2017, iHeart found itself with approximately \$16 billion of funded debt that required payment of approximately \$1.4 billion in cash interest. Despite significant efforts to reach agreement with all relevant stakeholders, iHeart was unable to do so and was forced to seek Chapter 11 bankruptcy protection. The Chapter 11 process permitted iHeart to comprehensively address its balance sheet and position the company and its subsidiaries to thrive on a long-term basis.

³³ See *Existing Shareholders of Clear Channel Communications, Inc. and Shareholders of Thomas H. Lee Equity Fund VI, L.P., Bain Capital (CC) IX, L.P., and BT Triple Crown Capital Holdings III, Inc.*, Memorandum Opinion and Order, 23 FCC Rcd 1421 (2008).

iHeart and its subsidiaries have also taken various operational steps to stem the negative effect of marketplace trends. Among other initiatives, iHeart and its subsidiaries have successfully developed emerging platforms, including the industry-leading “iHeartRadio” digital platform and nationally-recognized iHeartRadio-branded live events. These steps were designed to permit iHeart to keep pace with competition not only from other radio broadcasters, but also from the broader media and entertainment industries, by transforming the company from a terrestrial radio broadcasting company into a diversified media, entertainment, and data company. Although iHeart’s business has been built on the foundation of its radio broadcast stations, today the company is much more than a terrestrial broadcaster. It delivers music, news, talk, sports, podcasts, and other content to diverse audiences across multiple platforms, including through its broadcast stations; online (via the iHeartRadio app and on its stations’ websites); on HD digital radio and satellite channels; on smartphones, iPads, and other tablets; through in-vehicle entertainment and navigation systems; and via live events.

iHeart has also continued to invest in compelling content produced by Premiere Radio Networks that airs on its own radio stations and on other affiliated stations owned by independent third parties. In addition, iHeart operates the Total Traffic & Weather Network (“TTWN”), which is the largest audio network provider of traffic, weather, news, and sports reports in the United States and is available to almost every commuter in America. Through its owned radio stations and Premiere Networks and TTWN affiliates, iHeart is able to ensure widespread availability of not only its audio entertainment programming, but also important safety and weather information. In addition, iHeart has implemented a number of other initiatives to reduce costs and increase revenue generating opportunities.

As iHeart seeks to implement its post-restructuring business operations and continue its efforts to offer enhanced service to the public, flexibility in accessing capital is essential. iHeart operates in a diverse and expanding audio entertainment ecosystem, which includes not only other terrestrial broadcasters, but also the nation's sole satellite radio provider, SiriusXM, and a significant and ever-increasing array of internet platforms which offer music streaming, podcasts, and other forms of audio programming.³⁴ iHeart's main revenue source remains advertising, moreover, rendering other sources of entertainment such as television broadcasting, cable television, internet-delivered programming, and websites and social media platforms relevant to its overall ability to compete effectively and ensure its financial health so that it can continue to serve its listeners and innovate. However, the vast majority of iHeart's competitors for audiences and advertising dollars are not subject to the FCC's foreign ownership limitations at all. These competitors thus have unbridled access to both foreign and domestic capital markets alike, affording them a distinct competitive advantage over iHeart which, absent grant of the requested declaratory ruling, will be unable to take advantage of the lower costs of foreign capital or accept investments from foreign strategic investors. Allowing iHeart to access such sources of foreign investment, by contrast, will position iHeart more similarly to other competitors for advertising dollars that are not subject to the foreign ownership limitations. The resulting flexibility and increased competitiveness will permit the company to maintain a healthy balance sheet, take more risks on innovative new programs and services, expand into additional

³⁴ These competitors have experienced significant growth in recent years. Weekly online audio listening grew from 17 percent in 2010 to 60 percent in 2019, while online audio listening in the car—where AM/FM radio has traditionally dominated—grew from 5 percent to 41 percent over the same period. See *The Infinite Dial*, Edison Research (Mar. 6, 2019) at 25, 32, <https://www.slideshare.net/webby2001/infinite-dial-2019>. The percentage of Americans 12 and older who had listened to a podcast more than doubled between 2010 and 2018, growing from 23 percent to 51 percent. *Id.* at 48.

markets, and compete more effectively, all to the benefit of U.S. consumers who access its programming and other service offerings. As the Commission has recognized, “[g]reater capitalization may in turn yield greater innovation.”³⁵ Grant of the Petition, and the resultant flexibility that it will afford iHeart to obtain cost-effective investment in its multiple lines of business, will bear this out.

2. Grant of the Petition Will Serve the Commission’s Interest in Encouraging Foreign Investment in Broadcasting and Ensure Comity with the Bankruptcy Laws.

For more than two decades, the FCC has recognized that enhancing the degree to which foreign investment can flow into the United States communications industries can yield important public interest benefits.³⁶ Indeed, the Commission has repeatedly recognized that “foreign investment has been and will continue to be an important source of financing for” communications companies in the U.S., and that creating additional opportunities for such investment can “foster[] technological innovation, economic growth, and job creation.”³⁷ In most recently adopting specific rules to streamline the process by which broadcasters in particular may seek to exceed the foreign ownership limits, the Commission expressed a desire to “facilitate investment from new sources of capital at a time of growing need for investment in

³⁵ *Commission Policies and Procedures Under Section 310(b)(4) of the Communications Act, Foreign Investment in Broadcast Licensees*, Declaratory Ruling, 28 FCC Rcd 16244, ¶ 10 (2013) (“2013 Broadcast Clarification Order”).

³⁶ *See, e.g., Rules and Policies on Foreign Participation in the U.S. Telecommunications Market, Market Entry and Regulation of Foreign Affiliated Entities*, Report and Order and Order on Reconsideration, 12 FCC Rcd 23891, ¶ 4 (1997).

³⁷ *Review of Foreign Ownership Policies for Common Carrier and Aeronautical Radio Licensees under Section 310(b)(4) of the Communications Act of 1934, as Amended*, Report and Order, 28 FCC Rcd 5741, ¶ 3 (2013).

this important sector of our nation’s economy.”³⁸ Furthering this important policy goal, the FCC has in recent years granted a number of petitions for declaratory ruling allowing broadcasters to exceed the Section 310(b)(4) limitation, including several permitting foreign ownership up to and including 100 percent.³⁹

The important public interest benefits associated with enabling greater foreign investment in communications companies take on added significance in the context of a company, such as iHeart, that has recently restructured its debt load pursuant to the Chapter 11 bankruptcy process. In the bankruptcy context, debt interests are often held by entities that are considered foreign under FCC rules, and the conversion of debt to equity is commonplace in restructurings. Debt holders that are seeking to be made whole following a company’s inability to fully satisfy its credit obligations generally prefer stock over warrants or other non-equity instruments, due to the greater voting and equity rights that stockholders enjoy. The foreign ownership limitations serve as a disincentive to foreign debt investment in communications companies subject to those limitations by limiting the extent to which foreign entities can receive equity in the event of a restructuring. By contrast, permitting the conversion of debt to equity (or warrants to equity)

³⁸ *2016 Foreign Ownership Order*, ¶ 2.

³⁹ See, e.g., *Zoo Communications, LLC*, Declaratory Ruling and Memorandum Opinion and Order, MB Docket No. 17-359, DA 19-108 (rel. Feb. 22, 2019) (permitting 100 percent foreign ownership in the licensee’s parent company); *Border Media Licenses, LLC*, Declaratory Ruling and Memorandum Opinion and Order, 33 FCC Rcd 8324 (2018) (same); *Grupo Multimedia LLC*, Declaratory Ruling and Memorandum Opinion and Order, 33 FCC Rcd 4465 (2018) (same); *Frontier Media*, Memorandum Opinion and Order and Declaratory Ruling, 32 FCC Rcd 1427 (2017) (same); *Hemisphere Media Group, Inc.*, Declaratory Ruling, 32 FCC Rcd 718 (2017) (permitting up to 49.99 percent foreign ownership in the licensee’s parent company); *Univision Holdings, Inc.*, Declaratory Ruling, 32 FCC Rcd 6 (2017) (same); *Pandora Radio LLC*, Declaratory Ruling, 30 FCC Rcd 5094 (2015) (same); see also *Cumulus Media Inc.*, Public Notice, MB Docket No. 19-143, DA 19-446 (May 21, 2019) (seeking comment on petition for declaratory ruling seeking up to 100 percent foreign ownership of licensee’s parent company).

following the grant of any necessary declaratory ruling will serve the important goal of incentivizing (or, at a minimum, not disincentivizing) foreign debt investments in companies subject to the Communications Act's foreign ownership limitations, allowing such companies to emerge in a stronger economic position. Moreover, permitting iHeart to take on additional foreign investment following grant of a declaratory ruling will afford it flexibility to access additional sources of capital in the future, and will increase the liquidity of its stock. These results, in turn, will produce the same kinds of benefits that the Commission has recognized will flow from facilitating foreign investment more generally.

Grant of the requested declaratory ruling would also further the broad aims of the Bankruptcy Code, which generally seeks to permit the retirement of debt and restructuring of a company's operations post-bankruptcy. Indeed, the courts have instructed that "agencies should constantly be alert to determine whether their policies might conflict with other federal policies and whether such conflict can be minimized."⁴⁰ In keeping with this directive, the Commission has recognized that it "is obliged to reconcile its policies under the [Communications] Act with the policies of other federal laws and statutes, including the bankruptcy laws in particular."⁴¹ As a result, the FCC has routinely acknowledged the need for comity with the bankruptcy process,⁴²

⁴⁰ *LaRose v. FCC*, 494 F.2d 1145, 1146 n.2 (D.C. Cir. 1974).

⁴¹ *Dale J. Parsons, Jr.*, Memorandum Opinion and Order, 10 FCC Rcd 2718, ¶ 11(1995).

⁴² See, e.g., *Tribune Broadcasting Co.*, Memorandum Opinion and Order, 27 FCC Rcd 14239, ¶ 4 (2012) (granting waivers of FCC ownership rules to "facilitate the emergence of the company from bankruptcy"); *Sam Jones, Jr.*, Memorandum Opinion and Order, 10 FCC Rcd 5330, ¶ 22 (1995) (deferring to bankruptcy court concerning debtor's financial status); *Fox Television Stations, Inc.*, Declaratory Ruling, 8 FCC Rcd 5341, ¶¶ 15, 42 (1993) (granting waiver of FCC ownership rule based on the interest in minimizing conflicts with bankruptcy law); *Second Thursday Corp.*, Memorandum Opinion and Order, 22 F.C.C.2d 515, ¶ 1 (1970) (creating exception to policy prohibiting sale of station when there are outstanding character issues

and has granted numerous foreign ownership petitions for declaratory ruling filed by companies in connection with their emergence from bankruptcy.⁴³ In particular, a primary goal of the Bankruptcy Laws is to ensure “equality of distribution among creditors.”⁴⁴ Where, as here, certain foreign creditors seek to exchange debt for equity in the context of a Chapter 11 restructuring, grant of a declaratory ruling directly serves that important bankruptcy-related policy goal.

3. Grant of the Petition Will Further U.S. Trade Policy Without Raising any National Security, Law Enforcement, or other Risks.

The FCC is not the only agency to recognize the benefits that flow from increased foreign investment in the United States. To the contrary, encouraging such investment is a cornerstone of U.S. foreign trade policy. Indeed, the United States Commerce Department has recognized that “[f]oreign direct investment in the United States is a key contributor to U.S. economic growth, directly and indirectly supporting nearly 13 million American jobs.”⁴⁵ Among other things, it is widely acknowledged that such investment “drives innovation” in new products and

concerning the seller for situations involving bankruptcy in the interest of protecting innocent creditors).

⁴³ See, e.g., *LightSquared Subsidiary, LLC*, Memorandum Opinion and Order and Declaratory Ruling, 30 FCC Rcd 13988, ¶ 29 (2015) (finding that allowing foreign ownership in excess of 25 percent “will serve the public interest by providing the capital necessary to allow the LightSquared entities to emerge from bankruptcy, consistent with the broad aims of the Bankruptcy Code, the Act and the Commission’s rules and policies”); see also, e.g., *Loral Satellite, Inc.*, Order and Authorization, 19 FCC Rcd 2404 (2004) (granting foreign ownership petition for declaratory ruling to company seeking consent to implement restructuring plan approved by bankruptcy court); *Space Station System Licensee, Inc.*, Memorandum Opinion, Order and Authorization, 17 FCC Rcd 2271 (2002) (same); *XO Communications, Inc.*, Memorandum Opinion, Order and Authorization, 17 FCC Rcd 19212 (2002) (same).

⁴⁴ *Fox Television Stations, Inc.*, ¶ 15.

⁴⁵ Steven Meyers, *SelectUSA’s \$30 Billion Impact on the U.S. Economy*, U.S. Department of Commerce Blog (June 7, 2018), <https://www.commerce.gov/news/blog/2018/06/selectusas-30-billion-impact-us-economy>.

services, including within the technology sector.⁴⁶ For this reason, the Department of Commerce and other federal agencies devote significant resources to encouraging foreign investment in U.S. businesses,⁴⁷ including broadcast and music-related companies in particular.⁴⁸

As a result of these efforts, the Department reported that in 2016, the U.S. experienced \$457.1 billion in foreign direct investment, which was the second highest level on record and more than double the average inflow of approximately \$200 billion in 2012 through 2014.⁴⁹ In addition, the value added to the U.S. gross domestic product (“GDP”) by majority-owned U.S. affiliates of foreign companies accounted for 6.4 percent of total U.S. business-sector GDP, a 1.9 percent increase over the prior year.⁵⁰ Such U.S. affiliates also employed 7.1 million workers, a 3.9 percent increase over 2015.⁵¹ Although foreign investment in the United States dropped to

⁴⁶ *Id.*

⁴⁷ SelectUSA, a government-wide program led by the Department of Commerce, seeks to “facilitate job-creating business investment into the United States and raise awareness of the critical role that economic development plays in the U.S. economy.” *About SelectUSA*, SelectUSA, U.S. Department of Commerce, <https://www.selectusa.gov/about-selectusa> (last visited July 22, 2019). More than twenty federal agencies and bureaus work together through the program to “increase coordination and provide guidance and information to respond to specific and broad-reaching issues that affect business investment decisions,” in order to facilitate foreign investment and job creation. *Id.*

⁴⁸ *See, e.g., Media and Entertainment Spotlight*, SelectUSA, U.S. Department of Commerce, <https://www.selectusa.gov/media-entertainment-industry-united-states> (last visited July 22, 2019); *Foreign Direct Investment (FDI): High-Tech*, SelectUSA, U.S. Department of Commerce, <https://www.selectusa.gov/high-tech-fact-sheet> (last visited July 22, 2019).

⁴⁹ *Foreign Direct Investment in the United States* (2017), U.S. Department of Commerce, at 1, <https://www.commerce.gov/sites/default/files/migrated/reports/FDIUS2017update.pdf>.

⁵⁰ *Activities of U.S. Affiliates of Foreign Multinational Enterprises, 2016* (2018), U.S. Bureau of Economic Analysis, <https://www.bea.gov/system/files/2018-11/imne1118.pdf>.

⁵¹ *Id.*

an estimated \$259.6 billion in 2017, this was still the fifth-highest level within the prior decade.⁵² Among the key drivers of inbound foreign investment has been the United States' status as "one of the most open markets and investment climates in the world."⁵³

Grant of the requested declaratory ruling will provide the benefits of foreign investment to iHeart without raising any countervailing national security, law enforcement, or other risks. No individual foreign party would control iHeart, eliminating any risk that a particular foreign entity would control programming or content on iHeart stations or through its digital and other platforms. The only entities requiring specific approval here are German- and Bermuda-organized companies and/or their subsidiaries. These two countries are among the United States' closest and strongest allies⁵⁴ and, as demonstrated further below, are large investors in, and engage in robust reciprocal trade with, the U.S.

a. Germany

Germany has historically been among the largest investors in United States businesses,⁵⁵ and enjoys robust bilateral trade relations with the United States.⁵⁶ In 2017, United States direct

⁵² *New Foreign Direct Investment in the United States: 2017* (2018), U.S. Department of Commerce, at 1, <https://www.bea.gov/system/files/2018-08/fdi0718rs.pdf>.

⁵³ *Foreign Direct Investment in the United States* (2018), Organization for International Investment, at 2, <http://ofii-docs.ofii.org/dmfile/FDIUS-2018-Report.pdf> ("*OII Foreign Domestic Investment Report*").

⁵⁴ *U.S. Relations with Germany* (July 3, 2018), U.S. Department of State, Bureau of European and Eurasian Affairs, <https://www.state.gov/r/pa/ei/bgn/3997.htm> ("*U.S. Relations with Germany*"); *United States – Bermuda: A Special Relationship*, U.S. Department of State, United States of America, U.S. Consulate General in Bermuda, <https://bm.usconsulate.gov/our-relationship/policy-history/io/> (last visited July 22, 2019) ("*Bermuda: A Special Relationship*").

⁵⁵ *Foreign Direct Investment in the United States* (2017), U.S. Department of Commerce, at 5, <https://www.commerce.gov/sites/default/files/migrated/reports/FDIUS2017update.pdf>; *OII Foreign Domestic Investment Report* at 3.

⁵⁶ *U.S. Relations with Germany*.

investment in Germany was \$136.1 billion.⁵⁷ German investment in the United States has continued to grow in recent years, increasing from \$273.1 billion in 2012 to \$405.6 billion in 2017, for a total increase of 49 percent during that period.⁵⁸ World Bank statistics indicate that 8.7 percent of Germany's total exports went to the United States in 2017, and 6.06 percent of Germany's total imports originated in the United States.⁵⁹ In addition, the Commission has previously approved 100 percent ownership of the nation's third-largest wireless carrier, T-Mobile US, Inc. (T-Mobile), by German telecommunications company Deutsche Telekom AG.⁶⁰

b. Bermuda

Bermuda and the United States have been allies and trading partners since the eighteenth century⁶¹ and maintain strong government and commercial ties today.⁶² In 2017, United States

⁵⁷ *Foreign Direct Investment (FDI): Germany* (last updated May 2019), SelectUSA, U.S. Department of Commerce, <https://www.selectusa.gov/country-fact-sheet/Germany>; *Direct Investment Positions for 2017: Country and Industry Detail, Survey of Current Business* (Aug. 2018), Sarah A. Stutzman & Abdul Munasib, U.S. Bureau of Economic Analysis, at 6, <https://apps.bea.gov/scb/2018/08-august/pdf/0818-direct-investment-positions.pdf> (“BEA Direct Investment Positions 2017”).

⁵⁸ *OII Foreign Domestic Investment Report* at 4, 8.

⁵⁹ *Germany Trade at a Glance 2017*, World Bank, World Integrated Trade Solution, <https://wits.worldbank.org/countrysnapshot/en/DEU/textview> (last visited July 22, 2019).

⁶⁰ *See Section 214 Applications and International Authorizations Granted*, Public Notice, 29 FCC Rcd 1797, 1803 (Feb. 19, 2014); *Section 214 Applications and International Authorizations Granted*, Public Notice, 28 FCC Rcd 8006, 8008 (May 30, 2013); *Deutsche Telekom, AG, T-Mobile USA, Inc., and MetroPCS Communications, Inc.*, Memorandum Opinion and Order and Declaratory Ruling, 28 FCC Rcd 2322, ¶ 96 (2013); *Voicestream Wireless Corporation, Powertel, Inc. and Deutsche Telekom AG*, Memorandum Opinion and Order, 16 FCC Rcd 9779 (2001). A request for renewal of these rulings is currently pending in connection with the proposed merger of T-Mobile and Sprint Corporation. *See* T-Mobile and Sprint, WT Docket No. 18-197.

⁶¹ *Bermuda: A Special Relationship*.

⁶² *See Foreign Direct Investment (FDI): Bermuda* (last updated May 2019), SelectUSA, U.S. Department of Commerce,

direct investment in Bermuda was \$346.8 billion.⁶³ Bermuda’s cumulative investment in the United States increased 96 percent between 2012 and 2017—from \$18.3 billion to \$35.9 billion.⁶⁴ According to World Bank statistics, 81.2 percent of Bermuda’s total exports went to the United States in 2017, and 66.5 percent of Bermuda’s total imports originated in the United States.⁶⁵ In addition, the Commission previously approved 100 percent ownership of a company holding Title II and Title III authorizations by a Bermuda company.⁶⁶

* * *

Finally, even if the proposed foreign ownership might be perceived as creating any national security or law enforcement concerns—which it should not—existing processes are sufficient to fully address such concerns. Grant of this Petition would therefore align with the U.S. government’s desire to promote increased cross-border investment and would further the

<https://www.selectusa.gov/servlet/servlet.FileDownload?file=015t0000000LKLm> (“*FDI: Bermuda*”).

⁶³ *BEA Direct Investment Positions 2017* at 6.

⁶⁴ *OII Foreign Domestic Investment Report* at 4, 8; *FDI: Bermuda*.

⁶⁵ *Bermuda Trade Summary 2017*, World Bank, World Integrated Trade Solution, <https://wits.worldbank.org/CountryProfile/en/Country/BMU/Year/2017/SummaryText> (last visited July 22, 2019).

⁶⁶ *See, e.g., Intelsat Holdings, Ltd.*, Memorandum Opinion and Order, 22 FCC Rcd 22151 (2007) (granting applications for consent to transfer control of holders of Title II and Title III authorizations to a Bermuda company). It also bears noting that the Bermudian government in 2012 amended its Companies Act to allow certain domestic companies—including telecommunications companies—to apply for a license to exceed 40 percent foreign ownership. *See 2018 Investment Climate Statements: Bermuda* (July 19, 2018), U.S. Department of State, <https://www.state.gov/reports/2018-investment-climate-statements/bermuda/>. Furthermore, in 2018, NASA completed major renovations of its Bermuda Tracking Station on Cooper’s Island Nature Reserve, which provides radar, telemetry, and command and control services for launches from Wallops Flight Facility in Virginia and Cape Canaveral Air Force Station in Florida. *See NASA Renovates, Dedicates Bermuda Tracking Station* (last updated Dec. 4, 2018), NASA, <https://www.nasa.gov/feature/nasa-renovates-dedicates-bermuda-tracking-station>.

economically beneficial relationship that the United States has worked hard to form with Germany, Bermuda, and other foreign countries across the world.⁶⁷

IV. CONCLUSION

As demonstrated above, grant of the relief sought in this Petition would deliver concrete public interest benefits by enhancing iHeart's ability to compete and innovate, encouraging foreign investment in broadcasting, ensuring comity with the bankruptcy laws, and furthering U.S. trade policy by encouraging reciprocal investment opportunities for U.S. companies in foreign markets, without raising any national security, law enforcement, or other risks. Accordingly, there is no basis to conclude that "the public interest will be served by the refusal" to grant the petition.⁶⁸ For these reasons, the Commission should authorize up to 100 percent of the voting rights, and up to 100 percent of the equity, in iHeart to be held by foreign entities or individuals.

Respectfully submitted,

By: /s/ Eve Klindera Reed

Eve Klindera Reed
Gregory L. Masters
Wiley Rein LLP
1776 K Street, NW
Washington, DC 20006
202.719.7000
ereed@wileyrein.com

Attorneys for iHeartMedia, Inc.

July 25, 2019

⁶⁷ See, e.g., *Frontier Media*, ¶ 7 (granting petition for declaratory ruling in part on the ground that such action would "potentially encourage reciprocal investment opportunities for U.S. companies in foreign markets"); *Zoo Communications*, ¶ 4 (same).

⁶⁸ 47 U.S.C. § 310(b)(4).

Schedule of Exhibits

Exhibit A	Subsidiaries and Licenses (47 C.F.R. §§ 1.5001(a)-(c))
Exhibit B	Attributable Interest Holders (47 C.F.R. §§ 1.5001(e), (f), (g)(2))
Exhibit C	Post-Declaratory Ruling Ownership and Control Structure (47 C.F.R. § 1.5001(h)(2))
Exhibit D	Significant Holders of Interests in iHeartMedia, Inc.
Exhibit E	Estimate of Aggregate Foreign Ownership (47 C.F.R. § 1.5001(h)(1))
Exhibit F	Specific Approval Parties and Their Attributable Interest Holders (47 C.F.R. § 1.5001(i)-(j))
Exhibit G	Certification (47 C.F.R. §§ 1.5000(c)(1), 1.5001(l))

EXHIBIT A

Subsidiaries and Licenses

(47 C.F.R. §§ 1.5001(a)-(c))

iHeartMedia, Inc. and Licensee Subsidiaries¹

iHeartMedia, Inc. (“iHeart”)

FRN: 0019970417
Address: 20880 Stone Oak Parkway, San Antonio, TX 78258
Phone number: (210)822-2828
Organized: Delaware
Business type: Corporation
Service: N/A

AMFM Broadcasting Licenses, LLC

FRN: 0012325395
Address: 7136 S. Yale Ave., Suite 501, Tulsa, OK, 74136
Phone number: (918)664-4581
Organized: Delaware
Business type: Limited Liability Company
Service: Broadcast Radio

AMFM Broadcasting Licenses, LLC, an indirect wholly-owned subsidiary of iHeart, is the licensee and/or permittee of the following stations:

Call Sign	Service	City	State	Fac. Id
K244FE	FX	Calhoun Beach	MN	147274
K278BP	FX	Cottage Grove	MN	142412
K280DT	FX	Thousand Oaks	CA	14241
K292CR	FX	Simi Valley	CA	34426
K300DP	FX	Sacramento	CA	202129
KBEB	FM	Sacramento	CA	10146
KBIG	FM	Los Angeles	CA	6360
KBIG-FM1	FB	Santa Clarita	CA	198145
KDWB-FM	FM	Richfield	MN	41967
KEEY-FM	FM	St. Paul	MN	59967
KFBK	AM	Sacramento	CA	10145
KFXN-FM	FM	Minneapolis	MN	54458
KGGI	FM	Riverside	CA	10135
KHYL	FM	Auburn	CA	10144
KIOI	FM	San Francisco	CA	34930
KIOI-FM1	FB	Walnut Creek	CA	4085
KIOI-FM2	FB	Pleasanton	CA	90740

¹ Information in this Exhibit was obtained from databases maintained by iHeart’s outside counsel, FCC records, and SEC filings.

Call Sign	Service	City	State	Fac. Id
KISQ	FM	San Francisco	CA	59964
KISQ-FM2	FB	Pleasanton	CA	59993
KISQ-FM3	FB	Concord	CA	59973
KKDD	AM	San Bernardino	CA	10134
KKSF	AM	Oakland	CA	59966
KMEL	FM	San Francisco	CA	35121
KMEL-FM2	FB	Walnut Creek	CA	136936
KNEW	AM	Oakland	CA	59957
KOSF	FM	San Francisco	CA	65484
KOSF-FM2	FB	Pleasanton	CA	86911
KOST	FM	Los Angeles	CA	34424
KOST-FM1	FB	Santa Clarita	CA	198146
KOQL	FM	Anoka	MN	54457
KRRL	FM	Los Angeles	CA	35022
KRRL-FM1	FB	Santa Clarita	CA	198144
KSTE	AM	Rancho Cordova	CA	22883
KTCZ-FM	FM	Minneapolis	MN	10142
KTLK	AM	Minneapolis	MN	59961
KYLD	FM	San Francisco	CA	59989
KYLD-FM1	FB	Pleasanton	CA	59990
KYSR	FM	Los Angeles	CA	36019
WEBG	FM	Chicago	IL	53971
WGCI-FM	FM	Chicago	IL	51165
WGRB	AM	Chicago	IL	51162
WKSC-FM	FM	Chicago	IL	74178
WLIT-FM	FM	Chicago	IL	70042
WVAZ	FM	Oak Park	IL	6588

AMFM Radio Licenses, LLC

FRN: 0001656586
 Address: 7136 S. Yale Ave., Suite 501, Tulsa, OK, 74136
 Phone number: (918)664-4581
 Organized: Delaware
 Business type: Limited Liability Company
 Service: Broadcast Radio

AMFM Radio Licenses, LLC, an indirect wholly-owned subsidiary of iHeart, is the licensee and/or permittee of the following stations:

Call Sign	Service	City	State	Fac. Id
K229DB	FX	Phoenix	AZ	151323

Call Sign	Service	City	State	Fac. Id
K254DL	FX	Sioux City	IA	202575
KFYI	AM	Phoenix	AZ	63918
KGLI	FM	Sioux City	IA	8771
KGME	AM	Phoenix	AZ	65480
KHTY	AM	Bakersfield	CA	40868
KMNS	AM	Sioux City	IA	10775
KOY	AM	Phoenix	AZ	63914
KSEZ	FM	Sioux City	IA	10777
KSFT-FM	FM	South Sioux City	NE	10776
KWSL	AM	Sioux City	IA	8769
KYOT	FM	Phoenix	AZ	18648
W235AV	FX	Tatnuck	MA	138657
W240BK	FX	Rutland	GA	158306
W242CJ	FX	Brunswick	GA	141780
W247BW	FX	Macon	GA	140321
W250BJ	FX	Florence	SC	158024
W254CN	FX	Eau Claire	WI	138368
W254DO	FX	Brunswick	GA	202578
W265EB	FX	Hartford	CT	140333
W273DO	FX	Philadelphia	PA	138663
W281BI	FX	Trenton	NJ	140324
W283AB	FX	Florence	SC	3116
W284CQ	FX	Washington	DC	31140
W290CD	FX	Darlington	SC	3117
WASH	FM	Washington	DC	70933
WAXQ	FM	New York	NY	23004
WBGA	AM	Brunswick	GA	36930
WBGG	AM	Pittsburgh	PA	59960
WBIG-FM	FM	Washington	DC	54459
WBWL	FM	Lynn	MA	40824
WBWZ	FM	New Paltz	NY	48615
WCIB	FM	Falmouth	MA	2683
WCJM-FM	FM	West Point	GA	54863
WCOD-FM	FM	Hyannis	MA	29568
WDAR-FM	FM	Darlington	SC	3120
WDAS	AM	Philadelphia	PA	71315
WDAS-FM	FM	Philadelphia	PA	71316
WDFN	AM	Detroit	MI	59969
WDSC	AM	Dillon	SC	16935
WEGX	FM	Dillon	SC	16936
WEII	FM	Dennis	MA	54037
WGIG	AM	Brunswick	GA	63432
WGTR	FM	Bucksport	SC	3118

Call Sign	Service	City	State	Fac. Id
WHTZ	FM	Newark	NJ	59953
WIBB-FM	FM	Fort Valley	GA	64652
WIHB	AM	Macon	GA	41989
WIHB-FM	FM	Gray	GA	29128
WIHT	FM	Washington	DC	25080
WINR	AM	Binghamton	NY	67191
WIOQ	FM	Philadelphia	PA	20348
WISX	FM	Philadelphia	PA	53973
WJLB	FM	Detroit	MI	59592
WJMN	FM	Boston	MA	53972
WJMX	AM	Darlington	SC	3119
WJMX-FM	FM	Cheraw	SC	3114
WKKR	FM	Auburn	AL	22875
WKQI	FM	Detroit	MI	6592
WKSI-FM	FM	Stephens City	VA	26998
WKTU	FM	Lake Success	NY	6595
WLLZ	FM	Detroit	MI	59952
WLOB	FM	Ocean Isle Beach	NC	3122
WLTW	FM	New York	NY	56571
WMGE	AM	Dry Branch	GA	87110
WMRE	AM	Charles Town	WV	27003
WMXA	FM	Opelika	AL	22877
WMXD	FM	Detroit	MI	59596
WMZQ-FM	FM	Washington	DC	73305
WNIC	FM	Dearborn	MI	6594
WOR	AM	New York	NY	7710
WPCH	AM	West Point	GA	54864
WQBZ	FM	Fort Valley	GA	64641
WQGA	FM	Waycross	GA	65020
WRBV	FM	Warner Robins	GA	65043
WRFF	FM	Philadelphia	PA	53969
WRWD-FM	FM	Highland	NY	70719
WRXZ	FM	Briarcliff Acres	SC	66138
WRZE	FM	Kingstree	SC	3121
WTLM	AM	Opelika	AL	22876
WUSL	FM	Philadelphia	PA	20349
WWDC	FM	Washington	DC	8682
WWPR-FM	FM	New York	NY	6373
WWRK	AM	Florence	SC	3112
WWSW-FM	FM	Pittsburgh	PA	59968
WWXM	FM	Garden City	SC	12181
WXKS-FM	FM	Medford	MA	53965
WXTK	FM	West Yarmouth	MA	6250

Call Sign	Service	City	State	Fac. Id
WXXL	FM	Tavares	FL	29569
WYNA	FM	Calabash	NC	24932
WYNR	FM	Waycross	GA	57785
WZMG	AM	Pepperell	AL	24255
WZTF	FM	Scranton	SC	3115

AMFM Texas Licenses, LLC

FRN: 0019362706
 Address: 7136 S. Yale Ave., Suite 501, Tulsa, OK, 74136
 Phone number: (918)664-4581
 Organized: Texas
 Business type: Limited Liability Company
 Service: Broadcast Radio

AMFM Texas Licenses, LLC, an indirect wholly-owned subsidiary of iHeart, is the licensee of the following stations:

Call Sign	Service	City	State	Fac. Id
KBKS-FM	FM	Tacoma	WA	27020
KBME	AM	Houston	TX	23082
KHKS	FM	Denton	TX	23084
KIBT	FM	Fountain	CO	66669
KODA	FM	Houston	TX	35337
KTBS-FM	FM	Houston	TX	18516
KTRH	AM	Houston	TX	35674
KYRV	FM	Roseville	CA	11273
KZPS	FM	Dallas	TX	6378

Capstar TX, LLC

FRN: 0019362953
 Address: 7136 S. Yale Ave., Suite 501, Tulsa, OK, 74136
 Phone number: (918)664-4581
 Organized: Texas
 Business type: Limited Liability Company
 Service: Broadcast Radio

Capstar TX, LLC, an indirect wholly-owned subsidiary of iHeart, is the licensee and/or permittee of the following stations:

Call Sign	Service	City	State	Fac. Id
K230AF	FX	Kirtland	NM	78074
K235CD	FX	Omaha	NE	138619
K248DO	FX	Fort Smith	AR	202551
K253BV	FX	Oklahoma City	OK	140403
K254DM	FX	Baton Rouge	LA	202555
K256AS	FX	Honolulu	HI	152379
K257FX	FX	Spokane	WA	139340
K266BD	FX	Carmel Valley	CA	141381
K268DL	FX	Spokane	WA	200599
K272DQ	FX	Fayetteville	AR	48954
K272FE	FX	Council Bluffs	IA	138406
K277AG	FX	Beaumont	TX	51844
K279DB	FX	Stockton	CA	202553
K294AJ	FX	Durango	CO	29593
K298CW	FX	Spokane	WA	202552
K299AJ	FX	Durango	CO	29594
KAKO-FM	FM	Fairbanks	AK	12519
KALZ	FM	Fowler	CA	2097
KASE-FM	FM	Austin	TX	35849
KASH-FM	FM	Anchorage	AK	12958
KAZX	FM	Kirtland	NM	76749
KBFM	FM	Edinburg	TX	40777
KBFX	FM	Anchorage	AK	12962
KBGO	FM	Waco	TX	33724
KBOS-FM	FM	Tulare	CA	9748
KBPL	FM	Pueblo	CO	40848
KCBL	AM	Fresno	CA	9749
KCCY-FM	FM	Pueblo	CO	40847
KCDA	FM	Post Falls	ID	57625
KCQL	AM	Aztec	NM	29520
KDAG	FM	Farmington	NM	29519
KDGE	FM	Fort Worth-Dallas	TX	9620
KDNN	FM	Honolulu	HI	40144
KENI	AM	Anchorage	AK	12516
KEZA	FM	Fayetteville	AR	12702
KFAB	AM	Omaha	NE	26931
KFBT	FM	Hanford	CA	48776
KFBX	AM	Fairbanks	AK	12518
KFFF	FM	Bennington	NE	163
KFI	AM	Los Angeles	CA	34425
KFIV	AM	Modesto	CA	12959
KFNQ	AM	Seattle	WA	6387
KFOO-FM	FM	Opportunity	WA	60422

Call Sign	Service	City	State	Fac. Id
KFSO-FM	FM	Visalia	CA	2099
KFXR	AM	Dallas	TX	25375
KGOR	FM	Omaha	NE	26928
KGOT	FM	Anchorage	AK	12515
KHGE	FM	Fresno	CA	48777
KHVH	AM	Honolulu	HI	34591
KIAK-FM	FM	Fairbanks	AK	12517
KIGL	FM	Seligman	MO	35014
KIIZ-FM	FM	Killeen	TX	60802
KIKI	AM	Honolulu	HI	40143
KIOC	FM	Orange	TX	33060
KISC	FM	Spokane	WA	60419
KJAO	FM	Seattle	WA	1091
KJSN	FM	Modesto	CA	12960
KKBD	FM	Sallisaw	OK	26909
KKED	FM	Fairbanks	AK	69120
KKFG	FM	Bloomfield	NM	29521
KKIX	FM	Fayetteville	AR	48951
KKLI	FM	Widefield	CO	67187
KKMY	FM	Orange	TX	62239
KKTX	AM	Corpus Christi	TX	55166
KKZX	FM	Spokane	WA	53146
KLVI	AM	Beaumont	TX	25580
KMAG	FM	Fort Smith	AR	22098
KMCX-FM	FM	Ogallala	NE	42075
KMIY	FM	Tucson	AZ	53594
KMJM	AM	Cedar Rapids	IA	54164
KMRQ	FM	Riverbank	CA	12963
KMXF	FM	Lowell	AR	48955
KMXR	FM	Corpus Christi	TX	55163
KNCN	FM	Sinton	TX	67186
KNST	AM	Tucson	AZ	53589
KOGA	AM	Ogallala	NE	50065
KOGA-FM	FM	Ogallala	NE	50066
KOSO	FM	Patterson	CA	35426
KPHT	FM	Rocky Ford	CO	87658
KPHT-FM1	FB	Pueblo	CO	164838
KQBT	FM	Houston	TX	9625
KQNT	AM	Spokane	WA	60421
KQOD	FM	Stockton	CA	9134
KRBB	FM	Wichita	KS	39902
KRDU	AM	Dinuba	CA	54559
KRQQ	FM	Tucson	AZ	53591

Call Sign	Service	City	State	Fac. Id
KRVE	FM	Brusly	LA	40866
KRYS-FM	FM	Corpus Christi	TX	55162
KRZR	AM	Visalia	CA	2096
KSAB	FM	Robstown	TX	33776
KSOF	FM	Dinuba	CA	54560
KSSK	AM	Honolulu	HI	48774
KSSK-FM	FM	Waipahu	HI	48775
KTEX	FM	Mercedes	TX	64631
KTHR	FM	Wichita	KS	53600
KTRA-FM	FM	Farmington	NM	16827
KTZN	AM	Anchorage	AK	12967
KUBT	FM	Honolulu	HI	34592
KUCD	FM	Pearl City	HI	48778
KUNO	AM	Corpus Christi	TX	33777
KVET	AM	Austin	TX	35850
KVET-FM	FM	Austin	TX	62048
KVUU	FM	Pueblo	CO	35868
KWHN	AM	Fort Smith	AR	22099
KWNW	FM	Crawfordsville	AR	51855
KWSX	AM	Stockton	CA	32214
KWTX	AM	Waco	TX	33057
KWTX-FM	FM	Waco	TX	35902
KXKT	FM	Glenwood	IA	69686
KXNO	AM	Des Moines	IA	12964
KYKR	FM	Beaumont	TX	25581
KYMG	FM	Anchorage	AK	12514
KYWD	FM	Green Valley	AZ	24583
KZBB	FM	Poteau	OK	72715
KZCH	FM	Derby	KS	53599
KZFS	AM	Spokane	WA	53149
KZOK-FM	FM	Seattle	WA	20357
KZSN	FM	Hutchinson	KS	61364
W221CR	FX	Memphis	TN	143750
W222BY	FX	Laureldale	PA	138520
W225CJ	FX	Asheville	NC	141057
W227BF	FX	Shoreview	MN	140133
W227CX	FX	North Palm Beach	FL	143464
W239BV	FX	Winchester	VA	142766
W240EC	FX	Albany	NY	202301
W244AV	FX	Blacksburg, etc.	VA	37748
W244DX	FX	Erie	PA	201344
W248AW	FX	Indianapolis	IN	140551
W248BQ	FX	Nashville	TN	155291

Call Sign	Service	City	State	Fac. Id
W249DZ	FX	Providence	RI	202300
W252CM	FX	Nashville	TN	139698
W254AZ	FX	Belmont	NC	140562
W259BW	FX	Canton	OH	144998
W259DE	FX	Savannah	GA	200505
W263DB	FX	Lancaster	PA	144779
W265CV	FX	Madison	WI	140503
W265DB	FX	Milbrook	CT	139897
W266BC	FX	Tupelo	MS	140567
W268DF	FX	Decatur	AL	202580
W268DK	FX	Manchester	NH	202125
W270DQ	FX	Gadsden	AL	202582
W273CX	FX	Huntsville	AL	140561
W278CY	FX	Columbia	SC	202554
W280EW	FX	Wheeling	WV	140908
W284BA	FX	Warwick	RI	156672
W286BK	FX	Birmingham	AL	150239
W288CX	FX	Columbia	SC	139935
W290BE	FX	Hudson	NY	147923
W292DH	FX	Pittsburgh	PA	148658
W292EG	FX	Eau Claire	WI	142726
W293AH	FX	Huntsville	AL	25384
W295BN	FX	Catskill	NY	37231
W295DE	FX	Cleveland	OH	147802
W299CS	FX	Tupelo	MS	200510
W299CX	FX	Rochester	NH	203151
W300BQ	FX	Vero Beach	FL	139428
WAAX	AM	Gadsden	AL	22996
WACL	FM	Elkton	VA	63491
WACO-FM	FM	Waco	TX	59264
WACT	AM	Tuscaloosa	AL	48643
WAEB	AM	Allentown	PA	14371
WAEB-FM	FM	Allentown	PA	14372
WAEV	FM	Savannah	GA	50403
WAKS	FM	Akron	OH	49952
WAMX	FM	Milton	WV	60450
WARF	AM	Akron	OH	49951
WATQ	FM	Chetek	WI	36357
WAVW	FM	Stuart	FL	14376
WBBD	AM	Wheeling	WV	73192
WBBQ-FM	FM	Augusta	GA	59249
WBHP	AM	Huntsville	AL	44025
WBIZ	AM	Eau Claire	WI	2107

Call Sign	Service	City	State	Fac. Id
WBIZ-FM	FM	Eau Claire	WI	2108
WBVB	FM	Coal Grove	OH	507
WBZT	AM	West Palm Beach	FL	20439
WCOS	AM	Columbia	SC	4673
WCOS-FM	FM	Columbia	SC	71290
WCZR	FM	Vero Beach	FL	41066
WDCG	FM	Durham	NC	53597
WDOV	AM	Dover	DE	4670
WDRM	FM	Decatur	AL	44024
WDSD	FM	Dover	DE	4669
WDVE	FM	Pittsburgh	PA	59588
WDXB	FM	Pelham	AL	2114
WEGW	FM	Wheeling	WV	72173
WEND	FM	Salisbury	NC	74074
WERC	AM	Birmingham	AL	2112
WERC-FM	FM	Hoover	AL	62278
WERZ	FM	Exeter	NH	53385
WESE	FM	Baldwyn	MS	68352
WFBQ	FM	Indianapolis	IN	59590
WFKS	FM	Melbourne	FL	11409
WFMF	FM	Baton Rouge	LA	4053
WFNN	AM	Erie	PA	26611
WFQX	FM	Front Royal	VA	4675
WFXN-FM	FM	Galion	OH	39730
WGIR	AM	Manchester	NH	35237
WGIR-FM	FM	Manchester	NH	35240
WGMZ	FM	Glencoe	AL	2465
WGVL	AM	Greenville	SC	59821
WHCN	FM	Hartford	CT	72144
WHEB	FM	Portsmouth	NH	35219
WHJJ	AM	Providence	RI	37234
WHJY	FM	Providence	RI	72298
WHLH	FM	Jackson	MS	59825
WHLW	FM	Luverne	AL	6655
WHOS	AM	Decatur	AL	44023
WIBA	AM	Madison	WI	17384
WIBA-FM	FM	Sauk City	WI	17385
WISN	AM	Milwaukee	WI	65695
WJBO	AM	Baton Rouge	LA	4054
WJDX	AM	Jackson	MS	59817
WJDX-FM	FM	Kosciusko	MS	6482
WJDY	AM	Salisbury	MD	13672
WJET	AM	Erie	PA	33769

Call Sign	Service	City	State	Fac. Id
WJJS	FM	Salem	VA	73956
WJJX	FM	Appomattox	VA	36094
WJQQ	FM	Somerset	KY	21624
WKCY	AM	Harrisonburg	VA	41815
WKCY-FM	FM	Harrisonburg	VA	41811
WKEE-FM	FM	Huntington	WV	500
WKKT	FM	Statesville	NC	68207
WKMQ	AM	Tupelo	MS	68351
WKSF	FM	Old Fort	NC	2947
WKSP	FM	Aiken	SC	46966
WKSS	FM	Hartford-Meriden	CT	53384
WKST-FM	FM	Pittsburgh	PA	65678
WKWK-FM	FM	Wheeling	WV	73193
WKZP	FM	West Ocean City	MD	4674
WLAC	AM	Nashville	TN	34391
WLKO	FM	Hickory	NC	68211
WLLK-FM	FM	Somerset	KY	72780
WLRO-FM	FM	Cocoa	FL	20372
WLTM	FM	Mina	NY	191524
WLTY	FM	Cayce	SC	4667
WLUB	FM	Augusta	GA	59250
WLVH	FM	Hardeeville	SC	31094
WMAD	FM	Cross Plains	WI	50055
WMAG	FM	High Point	NC	73258
WMAN	AM	Mansfield	OH	67609
WMAN-FM	FM	Fredericktown	OH	50121
WMEQ	AM	Menomonie	WI	52474
WMEQ-FM	FM	Menomonie	WI	52473
WMJJ	FM	Birmingham	AL	2111
WMKS	FM	High Point	NC	74204
WMMB	AM	Melbourne	FL	11408
WMMV	AM	Cocoa	FL	20371
WMSI-FM	FM	Jackson	MS	59822
WMYI	FM	Hendersonville	NC	59818
WNCB	FM	Cary	NC	53596
WNCO	AM	Ashland	OH	2926
WNCO-FM	FM	Ashland	OH	2925
WNDE	AM	Indianapolis	IN	59591
WNOK	FM	Columbia	SC	19472
WNRQ	FM	Nashville	TN	34392
WOFX	AM	Troy	NY	37233
WOLT	FM	Indianapolis	IN	59589
WOVK	FM	Wheeling	WV	44048

Call Sign	Service	City	State	Fac. Id
WPGB	FM	Pittsburgh	PA	18511
WPKX	AM	Rochester	NH	53387
WPOP	AM	Hartford	CT	37232
WPRW-FM	FM	Martinez	GA	46967
WPYX	FM	Albany	NY	73911
WQBT	FM	Savannah	GA	8594
WQEN	FM	Trussville	AL	22997
WQHQ	FM	Ocean City-Salisbury	MD	28166
WQOL	FM	Vero Beach	FL	67604
WQRB	FM	Bloomer	WI	5870
WQSO	FM	Rochester	NH	53388
WQYZ	FM	Ocean Springs	MS	24513
WRDU	FM	Wake Forest	NC	74125
WRDX	FM	Smyrna	DE	4676
WRFX	FM	Kannapolis	NC	53970
WRKT	FM	North East	PA	55063
WRLX	FM	West Palm Beach	FL	20442
WRNW	FM	Milwaukee	WI	26609
WROV-FM	FM	Martinsville	VA	37747
WROK-FM	FM	Canton	OH	8550
WRTR	FM	Brookwood	AL	48645
WRTS	FM	Erie	PA	55028
WRVW	FM	Lebanon	TN	59824
WSAN	AM	Allentown	PA	18233
WSBY-FM	FM	Salisbury	MD	13673
WSEK	AM	Burnside	KY	37024
WSEK-FM	FM	Burnside	KY	37027
WSFC	AM	Somerset	KY	21626
WSIX-FM	FM	Nashville	TN	59815
WSNE-FM	FM	Taunton	MA	74069
WSOK	AM	Savannah	GA	50406
WSRS	FM	Worcester	MA	35225
WSSL-FM	FM	Gray Court	SC	59819
WSTV	FM	Roanoke	VA	64082
WSTZ-FM	FM	Vicksburg	MS	37177
WSWR	FM	Shelby	OH	66247
WTAG	AM	Worcester	MA	35230
WTAK-FM	FM	Hartselle	AL	25383
WTBU	FM	York Center	ME	35218
WTCR-FM	FM	Huntington	WV	7983
WTGM	AM	Salisbury	MD	28165
WTKK	FM	Knightdale	NC	73936
WTKS	AM	Savannah	GA	8589

Call Sign	Service	City	State	Fac. Id
WTRY-FM	FM	Rotterdam	NY	8563
WTSO	AM	Madison	WI	41973
WTUP	AM	Tupelo	MS	68353
WTWF	FM	Fairview	PA	76244
WTXT	FM	Fayette	AL	68418
WUBT	FM	Russellville	KY	34387
WUCS	FM	Windsor Locks	CT	46965
WUSQ-FM	FM	Winchester	VA	74160
WVHU	AM	Huntington	WV	505
WVKF	FM	Shadyside	OH	50150
WVOC	AM	Columbia	SC	11902
WVRT	FM	Mill Hall	PA	58313
WWFG	FM	Ocean City	MD	74179
WWMG	FM	Millbrook	AL	8662
WWNC	AM	Asheville	NC	2946
WWTX	AM	Wilmington	DE	14373
WWVA	AM	Wheeling	WV	44046
WWYZ	FM	Waterbury	CT	74205
WWZD-FM	FM	New Albany	MS	68354
WXBB	FM	Erie	PA	52144
WXBT	FM	West Columbia	SC	13589
WXDX-FM	FM	Pittsburgh	PA	60153
WXKS	AM	Newton	MA	20441
WXXF	FM	Loudonville	OH	33066
WXXM	FM	Sun Prairie	WI	17383
WYHT	FM	Mansfield	OH	67611
WYKZ	FM	Beaufort	SC	67680
WYNF	AM	Augusta	GA	59248
WYNK-FM	FM	Baton Rouge	LA	47402
WYYD	FM	Amherst	VA	74282
WYYD-FM1	FB	Roanoke	VA	74283
WZBQ	FM	Carrollton	AL	70264
WZEE	FM	Madison	WI	41980
WZHT	FM	Troy	AL	8649
WZRL	FM	Plainfield	IN	54705
WZTA	AM	Vero Beach	FL	41067
WZWB	AM	Kenova	WV	14377
WZZO	FM	Bethlehem	PA	14375

CC Licenses, LLC

FRN: 0014042816
Address: 7136 S. Yale Ave., Suite 501, Tulsa, OK, 74136
Phone number: (918)664-4581
Organized: Delaware
Business type: Limited Liability Company
Service: Broadcast Radio

CC Licenses, LLC, an indirect wholly-owned subsidiary of iHeart, is the licensee and/or permittee of the following stations:

Call Sign	Service	City	State	Fac. Id
K222DJ	FX	Pueblo	CO	202127
K228FH	FX	Montoya	TX	151663
K228FY	FX	Rochester	MN	202567
K229DN	FX	San Antonio	TX	202304
K257GR	FX	Pueblo	CO	202128
K259AF	FX	Bismarck	ND	2203
K265DG	FX	Hollister	CA	8207
K265DK	FX	Greenfield	CA	8208
K281DC	FX	Bismarck	ND	203160
KAGG	FM	Madisonville	TX	49944
KAJA	FM	San Antonio	TX	11919
KBFP	AM	Bakersfield	CA	28846
KBFP-FM	FM	Delano	CA	37774
KBMR	AM	Bismarck	ND	2207
KCAD	FM	Dickinson	ND	57740
KCJB	AM	Minot	ND	55681
KCSJ	AM	Pueblo	CO	53846
KDFO	FM	Delano	CA	64607
KDJE	FM	Jacksonville	AR	23025
KDON-FM	FM	Salinas	CA	26930
KDZA	AM	Pueblo	CO	53850
KESZ	FM	Phoenix	AZ	40992
KFAN	AM	Rochester	MN	35526
KFBK-FM	FM	Pollock Pines	CA	60300
KFXR-FM	FM	Chinle	AZ	66816
KHEY	AM	El Paso	TX	67771
KHEY-FM	FM	El Paso	TX	69563
KHFI-FM	FM	Georgetown	TX	11948
KHKN	FM	Maumelle	AR	61366
KION	AM	Salinas	CA	26925
KIZZ	FM	Minot	ND	15968
KJMS	FM	Olive Branch	MS	35874

Call Sign	Service	City	State	Fac. Id
KKYS	FM	Bryan	TX	54903
KLTC	AM	Dickinson	ND	71870
KMFX-FM	FM	Lake City	MN	54635
KMJX	FM	Conway	AR	39689
KMXA-FM	FM	Minot	ND	34996
KMYT	FM	Temecula	CA	2910
KNFX-FM	FM	Bryan	TX	41410
KNIX-FM	FM	Phoenix	AZ	7698
KOCN	FM	Pacific Grove	CA	8082
KOHT	FM	Marana	AZ	8143
KPEZ	FM	Austin	TX	11935
KPRC	AM	Houston	TX	9644
KPRC-FM	FM	Salinas	CA	8204
KPRR	FM	El Paso	TX	68688
KODY	FM	Bismarck	ND	2204
KQXT-FM	FM	San Antonio	TX	11962
KRAB	FM	Greenacres	CA	17359
KRCH	FM	Rochester	MN	35527
KRPT	FM	Devine	TX	25904
KRRZ	AM	Minot	ND	9679
KSRV	FM	Tehachapi	CA	66228
KSSN	FM	Little Rock	AR	61363
KSSS	FM	Bismarck	ND	2210
KTKR	AM	San Antonio	TX	11945
KTMQ	FM	Temecula	CA	85012
KTOM-FM	FM	Marina	CA	40145
KTSM	AM	El Paso	TX	69561
KTSM-FM	FM	El Paso	TX	67762
KTZR	AM	Tucson	AZ	68316
KVVS	FM	Rosamond	CA	49950
KXEW	AM	South Tucson	AZ	8144
KXMR	AM	Bismarck	ND	2211
KXXM	FM	San Antonio	TX	28668
KYYX	FM	Minot	ND	55680
KZHT	FM	Salt Lake City	UT	63820
KZHT-FM1	FB	Park City	UT	166623
KZPR	FM	Minot	ND	9675
KZRX	FM	Dickinson	ND	57741
W229DF	FX	Columbus	GA	200816
W245BV	FX	Endwell	NY	33084
W245DK	FX	New Haven	CT	202570
W248BV	FX	Cumming	GA	146456
W253BV	FX	Poughkeepsie	NY	138571

Call Sign	Service	City	State	Fac. Id
W255DL	FX	Springfield	MA	202568
W257EM	FX	Louisville	KY	202312
W268DD	FX	Memphis	TN	202302
W279DW	FX	Akron	OH	202307
WAGH	FM	Smiths	AL	60656
WAMZ	FM	Louisville	KY	11921
WAVZ	AM	New Haven	CT	11920
WAZR	FM	Woodstock	VA	57910
WBBI	FM	Endwell	NY	18899
WBCG	FM	Murdock	FL	82071
WBCT	FM	Grand Rapids	MI	73606
WBFX	FM	Grand Rapids	MI	51727
WBKS	FM	Columbus Grove	OH	40714
WBNW-FM	FM	Endicott	NY	19626
WBUV	FM	Moss Point	MS	29687
WBZ	AM	Boston	MA	25444
WBZY	FM	Bowdon	GA	63406
WCHI	AM	Chillicothe	OH	74225
WCTW	FM	Catskill	NY	63527
WDAK	AM	Columbus	GA	60764
WDIA	AM	Memphis	TN	69569
WDMX	FM	Vienna	WV	4756
WEGR	FM	Arlington	TN	58397
WELI	AM	New Haven	CT	11933
WENE	AM	Endicott	NY	19625
WFFX	FM	Hattiesburg	MS	54611
WGEX	FM	Bainbridge	GA	52402
WGMY	FM	Thomasville	GA	61250
WGSY	AM	Phenix City-Columbus	AL	32383
WGY	AM	Schenectady	NY	15329
WGY-FM	FM	Albany	NY	55490
WHAL-FM	FM	Horn Lake	MS	58399
WHAS	AM	Louisville	KY	11934
WHBT-FM	FM	Moyock	NC	70345
WHCY	FM	Blairstown	NJ	11984
WHEN	AM	Syracuse	NY	7080
WHLO	AM	Akron	OH	43858
WHOF	FM	North Canton	OH	73135
WHRK	FM	Memphis	TN	54916
WHTY	FM	Phenix City	AL	66668
WHUC	AM	Hudson	NY	63531
WHYN	AM	Springfield	MA	55757
WHYN-FM	FM	Springfield	MA	55758

Call Sign	Service	City	State	Fac. Id
WJIP	AM	Ellenville	NY	63528
WJIZ-FM	FM	Albany	GA	6616
WJKX	FM	Ellisville	MS	61116
WJYZ	AM	Albany	GA	6617
WKAF	FM	Brockton	MA	19633
WKBZ	AM	Muskegon	MI	25087
WKCI	AM	Waynesboro	VA	70862
WKCI-FM	FM	Hamden	CT	11930
WKDW	AM	Staunton	VA	11666
WKGB-FM	FM	Conklin	NY	34451
WKIP	AM	Poughkeepsie	NY	73163
WKJK	AM	Louisville	KY	55497
WKKF	FM	Ballston Spa	NY	17030
WKKJ	FM	Chillicothe	OH	74224
WKNN-FM	FM	Pascagoula	MS	61367
WKRd	AM	Louisville	KY	53587
WKSJ-FM	FM	Mobile	AL	53145
WLTP	AM	Marietta	OH	55182
WMAX-FM	FM	Holland	MI	27471
WMJY	FM	Biloxi	MS	61368
WMOV-FM	FM	Norfolk	VA	31123
WMRR	FM	Muskegon Heights	MI	24640
WMRZ	FM	Dawson	GA	88542
WMUS	FM	Muskegon	MI	70635
WMXC	FM	Mobile	AL	8696
WMXW	FM	Vestal	NY	19624
WNDH	FM	Napoleon	OH	40713
WNNJ	FM	Newton	NJ	25413
WNOH	FM	Windsor	VA	69570
WNRW	FM	Prospect	KY	60706
WNSL	FM	Laurel	MS	16784
WNTM	AM	Mobile	AL	8695
WNUS	FM	Belpre	OH	67465
WOAI	AM	San Antonio	TX	11952
WOBB	FM	Tifton	GA	74182
WODC	FM	Ashville	OH	52042
WONW	AM	Defiance	OH	40710
WOOD	AM	Grand Rapids	MI	73604
WOOD-FM	FM	Muskegon	MI	25086
WOWI	FM	Norfolk	VA	69558
WPKF	FM	Poughkeepsie	NY	72380
WQLX	FM	Chillicothe	OH	65701
WQMF	FM	Jeffersonville	IN	50763

Call Sign	Service	City	State	Fac. Id
WQRV	FM	Meridianville	AL	19456
WRDA	FM	Canton	GA	10698
WREC	AM	Memphis	TN	58396
WRKH	FM	Mobile	AL	53142
WRKO	AM	Boston	MA	1902
WRNQ	FM	Poughkeepsie	NY	17771
WRNX	FM	Amherst	MA	25906
WRVB	FM	Marietta	OH	68306
WRVE	FM	Schenectady	NY	15330
WRWB-FM	FM	Ellenville	NY	63525
WSNX-FM	FM	Muskegon	MI	24644
WSRW	AM	Hillsboro	OH	65700
WSRW-FM	FM	Grand Rapids	MI	73605
WSTH-FM	FM	Alexander City	AL	60763
WSUS	FM	Franklin	NJ	74077
WSVO	FM	Staunton	VA	11665
WSYR	AM	Syracuse	NY	48720
WSYR-FM	FM	Solvay	NY	25018
WTFX-FM	FM	Clarksville	IN	37753
WTKG	AM	Grand Rapids	MI	51729
WTUP-FM	FM	Guntown	MS	71214
WVON	AM	Berwyn	IL	87178
WVRK	FM	Columbus	GA	39457
WWHT	FM	Syracuse	NY	57842
WYNT	FM	Caledonia	OH	68681
WYYY	FM	Syracuse	NY	48725
WZCR	FM	Hudson	NY	63532
WZLD	FM	Petal	MS	66954
WZLX	FM	Boston	MA	13806
WZOM	FM	Defiance	OH	40711

Citicasters Licenses, Inc.

FRN: 0018273367
Address: 7136 S. Yale Ave., Suite 501, Tulsa, OK, 74136
Phone number: (918)664-4581
Organized: Texas
Business type: Corporation
Service: Broadcast Radio

Citicasters Licenses, Inc., an indirect wholly-owned subsidiary of iHeart, is the licensee and/or permittee of the following stations:

Call Sign	Service	City	State	Fac. Id
K227DS	FX	St. Louis	MO	202546
K231AA	FX	Boulder	CO	48969
K231BQ	FX	Golden	CO	142150
K245CO	FX	Millman	IA	138341
K246CI	FX	Cheyenne	WY	158012
K251AU	FX	Albuquerque	NM	139245
K256AE	FX	Salt Lake City	UT	6544
K260DQ	FX	Denver	CO	202548
K265CA	FX	Albuquerque	NM	53641
K268CY	FX	Cedar Rapids	IA	140051
K269CL	FX	Evergreen	CO	48963
K277DH	FX	San Diego	CA	151282
K283BV	FX	Davenport	IA	140115
K297AK	FX	Loveland	CO	140272
KAAZ-FM	FM	Spanish Fork	UT	63536
KAAZ-FM1	FB	Park City	UT	166620
KASI	AM	Ames	IA	2116
KATZ	AM	St. Louis	MO	48968
KATZ-FM	FM	Bridgeton	MO	48958
KBCO	FM	Boulder	CO	48966
KBPI	FM	Fort Collins	CO	68976
KBQI	FM	Albuquerque	NM	4706
KCOL	AM	Wellington	CO	68685
KCQQ	FM	Davenport	IA	32987
KCYZ	FM	Ames	IA	2115
KDMX	FM	Dallas	TX	47739
KDRB	FM	Des Moines	IA	51332
KDSP	AM	Thornton	CO	29740
KDXA	FM	Ankeny	IA	69635
KEGL	FM	Fort Worth	TX	18114
KEIB	AM	Los Angeles	CA	19219
KEX	AM	Portland	OR	11271

Call Sign	Service	City	State	Fac. Id
KFBW	FM	Vancouver	WA	60640
KFOO	AM	Riverside	CA	27390
KFYR	AM	Bismarck	ND	41426
KGB-FM	FM	San Diego	CA	34454
KHHO	AM	Tacoma	WA	18523
KHOW	AM	Denver	CO	48962
KHTS-FM	FM	El Cajon	CA	20697
KIIS-FM	FM	Los Angeles	CA	19218
KIIS-FM1	FB	Santa Clarita	CA	198147
KIIX	AM	Fort Collins	CO	68966
KIOZ	FM	San Diego	CA	13504
KIOZ-FM1	FB	San Diego	CA	191753
KJKJ	FM	Grand Forks	ND	35012
KJMY	FM	Bountiful	UT	6543
KJMY-FM2	FB	Park City	UT	166619
KJR	AM	Seattle	WA	48386
KJR-FM	FM	Seattle	WA	48385
KKCW	FM	Beaverton	OR	68210
KKRQ	FM	Iowa City	IA	29076
KKRZ	FM	Portland	OR	11280
KKSJ-FM	FM	Cedar Rapids	IA	73594
KKXL	AM	Grand Forks	ND	20324
KKXL-FM	FM	Grand Forks	ND	20325
KLLT	FM	Columbia	IL	13793
KLOU	FM	St. Louis	MO	9626
KLSD	AM	San Diego	CA	34452
KLTH	FM	Lake Oswego	OR	4115
KMXG	FM	Clinton	IA	60359
KMXP	FM	Phoenix	AZ	6361
KMYI	FM	San Diego	CA	58821
KNRS	AM	Salt Lake City	UT	63818
KNRS-FM	FM	Centerville	UT	69555
KNRS-FM1	FB	Park City	UT	180825
KOA	AM	Denver	CO	29738
KODJ	FM	Salt Lake City	UT	48916
KODJ-FM1	FB	Park City	UT	166618
KOGO	AM	San Diego	CA	51514
KOLT-FM	FM	Cheyenne	WY	30225
KOSY-FM	FM	Anamosa	IA	162475
KPAW	FM	Warren AFB	WY	67474
KPEK	FM	Albuquerque	NM	4704
KPOJ	AM	Portland	OR	53069
KPTT	FM	Denver	CO	48967

Call Sign	Service	City	State	Fac. Id
KPWK	AM	San Bernardino	CA	2399
KQHT	FM	Crookston	MN	9657
KRFX	FM	Denver	CO	29731
KSD	FM	St. Louis	MO	20360
KSLZ	FM	St. Louis	MO	48960
KSME	FM	Greeley	CO	17626
KSNE-FM	FM	Las Vegas	NV	71525
KSSX	FM	Carlsbad	CA	67664
KTCL	FM	Wheat Ridge	CO	68684
KTEG	FM	Santa Fe	NM	53652
KUBE	FM	Seattle	WA	48387
KUUL	FM	East Moline	IL	43208
KWBL	FM	Denver	CO	29739
KWNR	FM	Henderson	NV	61527
KXBG	FM	Cheyenne	WY	7693
KXIC	AM	Iowa City	IA	29075
KXJM	FM	Banks	OR	12551
KYMT	FM	Las Vegas	NV	6893
KYYY	FM	Bismarck	ND	41424
KZEP-FM	FM	San Antonio	TX	65329
KZZP	FM	Mesa	AZ	47742
W233AV	FX	Gulfport	FL	146121
W241DG	FX	Rochester	NY	202122
W249EB	FX	Venice	FL	202585
W256BT	FX	Lorain	OH	154527
W256CT	FX	Bayonet Point	FL	151584
W262CP	FX	Bayonet Point	FL	151587
W265EA	FX	Punta Gorda	FL	202584
W266DS	FX	Lexington	KY	202549
W268CC	FX	Hillsboro	OH	140101
W275AZ	FX	Wesley Chapel South	FL	148955
W276CR	FX	Bradenton	FL	149125
W280EV	FX	Sarasota	FL	140125
W286CQ	FX	Sarasota	FL	140144
WAIO	FM	Honeoye Falls	NY	24958
WAKZ	FM	Sharpsville	PA	74468
WBBG	FM	Niles	OH	73309
WBBS	FM	Fulton	NY	48730
WBEX	AM	Chillicothe	OH	52041
WBUL-FM	FM	Lexington	KY	70192
WCAO	AM	Baltimore	MD	63777
WCCF	AM	Punta Gorda	FL	28897
WCHD	FM	Kettering	OH	55500

Call Sign	Service	City	State	Fac. Id
WCHO	AM	Washington Court House	OH	57355
WCHO-FM	FM	Washington Court House	OH	57354
WCKY	AM	Cincinnati	OH	51722
WCKY-FM	FM	Pemberville	OH	70526
WCOH	AM	Newnan	GA	48739
WCOL-FM	FM	Columbus	OH	25037
WCTQ	FM	Venice	FL	3059
WCVU	FM	Solana	FL	71594
WCWA	AM	Toledo	OH	19627
WDDV	AM	Venice	FL	3060
WDFM	FM	Defiance	OH	73393
WDVI	FM	Rochester	NY	37546
WEBN	FM	Cincinnati	OH	29734
WEZL	FM	Charleston	SC	2441
WFLA	AM	Tampa	FL	29729
WFLZ-FM	FM	Tampa	FL	29732
WFUS	FM	Gulfport	FL	63984
WFXN	AM	Moline	IL	43199
WGAR-FM	FM	Cleveland	OH	47740
WGST	AM	Atlanta	GA	29730
WHAM	AM	Rochester	NY	37545
WHLK	FM	Cleveland	OH	59594
WHNZ	AM	Tampa	FL	23077
WHO	AM	Des Moines	IA	51331
WHTK	AM	Rochester	NY	37549
WIKX	FM	Charlotte Harbor	FL	28899
WILM	AM	Wilmington	DE	16438
WIMA	AM	Lima	OH	37498
WIMT	FM	Lima	OH	37497
WIOT	FM	Toledo	OH	19628
WIZE	AM	Springfield	OH	62208
WKBN	AM	Youngstown	OH	70519
WKDD	FM	Munroe Falls	OH	43863
WKFS	FM	Milford	OH	70866
WKGS	FM	Irondequoit	NY	3205
WKQQ	FM	Winchester	KY	68206
WKRC	AM	Cincinnati	OH	29737
WLAP	AM	Lexington	KY	68209
WLKT	FM	Lexington-Fayette	KY	29575
WLLR-FM	FM	Davenport	IA	60361
WLW	AM	Cincinnati	OH	29733
WMGP	FM	Hogansville	GA	39619
WMJI	FM	Cleveland	OH	73268

Call Sign	Service	City	State	Fac. Id
WMLX	FM	St. Marys	OH	37499
WMMS	FM	Cleveland	OH	73273
WMMX	FM	Dayton	OH	1904
WMRN	AM	Marion	OH	40169
WMRN-FM	FM	Marion	OH	59282
WMT	AM	Cedar Rapids	IA	73593
WMTX	FM	Tampa	FL	23078
WMXL	FM	Lexington	KY	68208
WMXY	FM	Youngstown	OH	73154
WNBL	FM	South Bristol Township	NY	27580
WNCD	FM	Youngstown	OH	13668
WNCI	FM	Columbus	OH	47741
WNIO	AM	Youngstown	OH	13669
WOC	AM	Davenport	IA	60360
WONE	AM	Dayton	OH	1903
WPOC	FM	Baltimore	MD	47747
WQIK-FM	FM	Jacksonville	FL	29728
WQSR	FM	Baltimore	MD	63778
WRDG	FM	Union City	GA	61142
WRFQ	FM	Mount Pleasant	SC	38901
WRUB	FM	Sarasota	FL	48672
WRVF	FM	Toledo	OH	62188
WSAI	AM	Cincinnati	OH	41994
WSDV	AM	Sarasota	FL	48671
WSOL-FM	FM	Brunswick	GA	23830
WSPD	AM	Toledo	OH	62187
WSRZ-FM	FM	Coral Cove	FL	48673
WTAM	AM	Cleveland	OH	59595
WTUE	FM	Dayton	OH	1909
WTVN	AM	Columbus	OH	11269
WTZB	FM	Englewood	FL	59127
WUBL	FM	Atlanta	GA	29735
WVCC	AM	Hogansville	GA	39620
WVKS	FM	Toledo	OH	48964
WVOR	FM	Canandaigua	NY	8505
WWKZ	FM	Okolona	MS	64364
WWPW	FM	Atlanta	GA	11275
WWTF	AM	Georgetown	KY	34246
WXLY	FM	North Charleston	SC	34163
WXTB	FM	Clearwater	FL	11274
WXZX	FM	Hilliard	OH	64716
WYTS	AM	Columbus	OH	25038
WZCB	FM	Dublin	OH	40170

Call Sign	Service	City	State	Fac. Id
WZDA	FM	Beavercreek	OH	67689
WZFT	FM	Baltimore	MD	8684
WZRX-FM	FM	Fort Shawnee	OH	8061

Clear Channel Broadcasting Licenses, Inc.

FRN: 0001587971
 Address: 7136 S. Yale Ave., Suite 501, Tulsa, OK, 74136
 Phone number: (918)664-4581
 Organized: Nevada
 Business type: Corporation
 Service: Broadcast Radio

Clear Channel Broadcasting Licenses, Inc., an indirect wholly-owned subsidiary of iHeart, is the licensee and/or permittee of the following stations:

Call Sign	Service	City	State	Fac. Id
K228BR	FX	Tulsa	OK	68292
K229DO	FX	Midwest City	OK	202572
K236BT	FX	Rochester	MN	138366
K242CE	FX	Meraux	LA	146875
K244FX	FX	New Orleans	LA	202121
K263DG	FX	Tulsa	OK	202573
K291CX	FX	Oklahoma City	OK	202571
KABQ	AM	Albuquerque	NM	65394
KAKC	AM	Tulsa	OK	11939
KBRQ	FM	Hillsboro	TX	60805
KBRU	FM	Oklahoma City	OK	11964
KCOL-FM	FM	Groves	TX	70443
KFMQ	FM	Gallup	NM	40806
KGBX-FM	FM	Nixa	MO	63887
KGHM	AM	Midwest City	OK	58388
KGLX	FM	Gallup	NM	60596
KGMV	AM	Springfield	MO	63886
KHKZ	FM	San Benito	TX	36166
KISO	FM	Omaha	NE	71411
KIZS	FM	Collinsville	OK	7669
KJYO	FM	Oklahoma City	OK	11918
KKDM	FM	Des Moines	IA	42108
KLFX	FM	Nolanville	TX	60090
KMOD-FM	FM	Tulsa	OK	11957
KOLZ	FM	Corrales	NM	39265

Call Sign	Service	City	State	Fac. Id
KQXX-FM	FM	Mission	TX	36168
KSWF	FM	Aurora	MO	3258
KTBT	FM	Broken Arrow	OK	33727
KTBZ	AM	Tulsa	OK	68293
KTGX	FM	Owasso	OK	68294
KTOK	AM	Oklahoma City	OK	11925
KTOZ-FM	FM	Pleasant Hope	MO	55164
KTST	FM	Oklahoma City	OK	58390
KVDU	FM	Houma	LA	34528
KVJM	FM	Hearne	TX	52835
KVNS	AM	Brownsville	TX	87142
KXTC	FM	Thoreau	NM	74310
KXUS	FM	Springfield	MO	16574
KXXY-FM	FM	Oklahoma City	OK	58389
KZRR	FM	Albuquerque	NM	68609
W224BR	FX	Chillicothe	OH	142375
W226CF	FX	Melbourne	FL	139444
W233BG	FX	Port Union	OH	147557
W235BA	FX	Williamsport	PA	149112
W240EG	FX	Eden	NC	140513
W242BF	FX	Panama City	FL	140060
W243EG	FX	Tallahassee	FL	200511
W245CL	FX	Deltona	FL	146621
W246BT	FX	Clermont	FL	151735
W246CK	FX	Kissimmee	FL	146627
W247DL	FX	Westfield	MA	144790
W249BS	FX	Savannah	GA	151866
W249DJ	FX	Lexington	KY	158396
W266CP	FX	Candler	NC	140160
W269CT	FX	Columbus	GA	140052
W269DT	FX	Syracuse	NY	140439
W273DU	FX	Panama City	FL	140153
W277CL	FX	Sofkee	GA	139453
W279EC	FX	Harrisburg	PA	202574
W283AN	FX	Altamonte Springs	FL	149386
W284CS	FX	Miami	FL	158312
W287CO	FX	Tallahassee	FL	144674
W287CP	FX	Columbus	OH	140069
W288ED	FX	Charlottesville	VA	148345
W295AZ	FX	Jacksonville Beach	FL	152950
W300CN	FX	Harrisonburg	VA	148178
WBGG-FM	FM	Fort Lauderdale	FL	11965
WBLJ-FM	FM	Shamokin	PA	47286

Call Sign	Service	City	State	Fac. Id
WBTP	FM	Clearwater	FL	41382
WBTT	FM	Naples Park	FL	55756
WBYL	FM	Salladasburg	PA	49267
WCKT	FM	Lehigh Acres	FL	55755
WDAE	AM	St. Petersburg	FL	74198
WDIZ	AM	Panama City	FL	66666
WEBZ	FM	Mexico Beach	FL	73617
WESC-FM	FM	Greenville	SC	4679
WFLA-FM	FM	Midway	FL	5379
WFLF	AM	Pine Hills	FL	51970
WFLF-FM	FM	Parker	FL	61262
WFSY	FM	Panama City	FL	66667
WFXJ	AM	Jacksonville	FL	51973
WHKF	FM	Harrisburg	PA	23464
WHP	AM	Harrisburg	PA	15322
WHQC	FM	Shelby	NC	74194
WHYI-FM	FM	Fort Lauderdale	FL	41381
WINZ	AM	Miami	FL	51977
WIOD	AM	Miami	FL	14242
WJBT	FM	Callahan	FL	51975
WJNO	AM	West Palm Beach	FL	1917
WJRR	FM	Cocoa Beach	FL	51983
WKGR	FM	Wellington	FL	1245
WKII	AM	Solana	FL	35214
WKKV-FM	FM	Racine	WI	68758
WKSB	FM	Williamsport	PA	15326
WKSL	FM	Neptune Beach	FL	67243
WLAN	AM	Lancaster	PA	52260
WLAN-FM	FM	Lancaster	PA	52259
WLDI	FM	Juno Beach	FL	2680
WLFJ	AM	Greenville	SC	4678
WLGX	FM	Louisville	KY	53593
WMGF	FM	Mount Dora	FL	51981
WMIA-FM	FM	Miami Beach	FL	51978
WMIB	FM	Fort Lauderdale	FL	67193
WMIL-FM	FM	Waukesha	WI	63919
WMXF	AM	Waynesville	NC	40979
WNOE-FM	FM	New Orleans	LA	58394
WODT	AM	New Orleans	LA	11947
WOKY	AM	Milwaukee	WI	63917
WOLL	FM	Hobe Sound	FL	32969
WOLZ	FM	Fort Myers	FL	13898
WPAP	FM	Panama City	FL	61252

Call Sign	Service	City	State	Fac. Id
WPEK	AM	Fairview	NC	41565
WPTI	FM	Eden	NC	55754
WQNQ	FM	Fletcher	NC	71341
WQNS	FM	Woodfin	NC	41008
WQUE-FM	FM	New Orleans	LA	11915
WRAK	AM	Williamsport	PA	15325
WRAW	AM	Reading	PA	69566
WRBT	FM	Harrisburg	PA	54019
WRFY-FM	FM	Reading	PA	69562
WRGV	FM	Pensacola	FL	63931
WRIT-FM	FM	Milwaukee	WI	60233
WRKK	AM	Hughesville	PA	49265
WRNO-FM	FM	New Orleans	LA	54890
WROO	FM	Mauldin	SC	25240
WRUM	FM	Orlando	FL	59976
WRVV	FM	Harrisburg	PA	15324
WSCC-FM	FM	Goose Creek	SC	31939
WTKS-FM	FM	Cocoa Beach	FL	53457
WTKT	AM	Harrisburg	PA	23463
WTKX-FM	FM	Pensacola	FL	61243
WTLY	AM	Tallahassee	FL	51592
WTNT-FM	FM	Tallahassee	FL	51590
WTQR	FM	Winston-Salem	NC	58392
WVBZ	FM	Clemmons	NC	501
WVRZ	FM	Mount Carmel	PA	25751
WWBB	FM	Providence	RI	54568
WWJK	FM	Green Cove Springs	FL	51974
WXSR	FM	Quincy	FL	25022
WYGM	AM	Orlando	FL	51982
WYLD	AM	New Orleans	LA	60707
WYLD-FM	FM	New Orleans	LA	11972
WZJZ	FM	Port Charlotte	FL	35213
WZTU	FM	Miami Beach	FL	51979
WZZR	FM	Riviera Beach	FL	36544

Los Angeles Broadcasting Partners, LLC

FRN: 0025799099
Address: 7136 S. Yale Ave., Suite 501, Tulsa, OK, 74136
Phone number: (918)664-4581
Organized: Delaware
Business type: Limited Liability Company
Service: Broadcast Radio

Los Angeles Broadcasting Partners, LLC, in which an indirect subsidiary of iHeart holds a majority interest, is the licensee of the following station:

Call Sign	Service	City	State	Fac. Id
KLAC	AM	Los Angeles	CA	59958

EXHIBIT B

Attributable Interest Holders of iHeartMedia, Inc. and Broadcast License Subsidiaries

(47 C.F.R. §§ 1.5001(e), (f), (g)(2))

Attributable Interest Holders of iHeartMedia, Inc. and Broadcast License Subsidiaries

(47 C.F.R. §§ 1.5001(e), (f), (g)(2))

The tables below list the following:

- 1) Name of each individual or entity holding an attributable interest in iHeartMedia, Inc. (“iHeart”) and its broadcast license subsidiaries (“License Subsidiaries”).
- 2) Citizenship or place of organization.
- 3) Nature of Interest: Office, director, general partner, limited partner, LLC member, attributable investor, etc.
- 4) Percentage of votes (rounded to the nearest percentage).
- 5) Percentage of equity (rounded to the nearest percentage).

Section I includes tables for the License Subsidiaries, Section II includes tables for the intermediate parent companies of the License Subsidiaries, and Section III includes a table for iHeart, which is the ultimate parent company of the License Subsidiaries. Section IV includes tables for Los Angeles Broadcasting Partners, LLC and its attributable interest holders that are not reported in Sections I-III.

I. LICENSE SUBSIDIARIES

A. Capstar TX LLC, AMFM Texas Licenses, LLC, and AMFM Radio Licenses, LLC, each of which are limited liability companies with a principal business of radio broadcasting, have the following attributable interest holders, all of which use the address 7136 S. Yale Ave., Suite 501, Tulsa, OK, 74136:

(1) Name	(2) Citizenship	(3) Nature of Interest	(4) %Votes	(5) %Equity
Capstar TX LLC, AMFM Texas Licenses, LLC, AMFM Radio Licenses, LLC	U.S.	---	--	--
Scott T. Bick	U.S.	SVP-Tax	0	0
Richard J. Bressler	U.S.	CFO, President ¹	0	0
Stephen G. Davis	U.S.	SVP-Real Estate, Facilities and Capital Management	0	0
Jeff Littlejohn	U.S.	EVP-Engineering & Systems Integration-IHM	0	0
Steven J. Macri	U.S.	EVP and CFO-IHM	0	0
Paul McNicol	U.S.	EVP, General Counsel, Secretary ²	0	0
Capstar Radio Operating Company	U.S.	Member	100	100

¹ Mr. Bressler is also a Manager of Capstar TX, LLC and AMFM Texas Licenses, LLC.

² Mr. McNicol is also a Manager of Capstar TX, LLC and AMFM Texas Licenses, LLC.

B. AMFM Broadcasting Licenses, LLC is a limited liability company with a principal business of radio broadcasting, and has the following attributable interest holders, all of which use the address 7136 S. Yale Ave., Suite 501, Tulsa, OK, 74136:

(1) Name	(2) Citizenship	(3) Nature of Interest	(4) %Votes	(5) %Equity
AMFM Broadcasting Licenses, LLC	U.S.	---	--	--
Scott T. Bick	U.S.	SVP-Tax	0	0
Richard J. Bressler	U.S.	CFO, President	0	0
Stephen G. Davis	U.S.	SVP-Real Estate, Facilities and Capital Management	0	0
Jeff Littlejohn	U.S.	EVP-Engineering & Systems Integration- IHM	0	0
Steven J. Macri	U.S.	EVP and CFO-IHM	0	0
Paul McNicol	U.S.	EVP, General Counsel, Secretary	0	0
AMFM Broadcasting, Inc.	U.S.	Sole Member	100	100

C. CC Licenses, LLC is a limited liability company with a principal business of radio broadcasting, and has the following attributable interest holders, all of which use the address 7136 S. Yale Ave., Suite 501, Tulsa, OK, 74136:

(1) Name	(2) Citizenship	(3) Nature of Interest	(4) %Votes	(5) %Equity
CC Licenses, LLC	U.S.	---	--	--
Scott T. Bick	U.S.	SVP-Tax	0	0
Richard J. Bressler	U.S.	CFO, President, Manager	0	0
Stephen G. Davis	U.S.	SVP-Real Estate, Facilities and Capital Management	0	0
Jeff Littlejohn	U.S.	EVP-Engineering & Systems Integration- IHM	0	0
Steven J. Macri	U.S.	EVP and CFO-IHM	0	0
Paul McNicol	U.S.	EVP, General Counsel, Secretary, Manager	0	0
iHeartMedia + Entertainment, Inc.	U.S.	Member	100	100

D. Clear Channel Broadcasting Licenses, Inc. is a corporation and is also an indirect parent of CC Licenses, LLC, and has a principal business of radio broadcasting. It has the following attributable interest holders, all of which use the address 7136 S. Yale Ave., Suite 501, Tulsa, OK, 74136:

(1)	(2)	(3)	(4)	(5)
Name	Citizenship	Nature of Interest	%Votes	%Equity
Clear Channel Broadcasting Licenses, Inc.	U.S.	---	--	--
Scott T. Bick	U.S.	SVP-Tax	0	0
Richard J. Bressler	U.S.	CFO, President, Director	0	0
Stephen G. Davis	U.S.	SVP-Real Estate, Facilities and Capital Management	0	0
Jeff Littlejohn	U.S.	EVP-Engineering & Systems Integration-IHM	0	0
Steven J. Macri	U.S.	EVP and CFO-IHM	0	0
Paul McNicol	U.S.	EVP, General Counsel, Secretary, Director	0	0
iHeartOperations, Inc.	U.S.	Shareholder	100	100

E. Citicasters Licenses, Inc. is a corporation with a principal business of radio broadcasting, and has the following attributable interest holders, all of which use the address 7136 S. Yale Ave., Suite 501, Tulsa, OK, 74136:

(1)	(2)	(3)	(4)	(5)
Name	Citizenship	Nature of Interest	%Votes	%Equity
Citicasters Licenses, Inc.	U.S.	---	--	--
Scott T. Bick	U.S.	SVP-Tax	0	0
Richard J. Bressler	U.S.	CFO, President, Director	0	0
Stephen G. Davis	U.S.	SVP-Real Estate, Facilities and Capital Management	0	0
Jeff Littlejohn	U.S.	EVP-Engineering & Systems Integration-IHM	0	0
Steven J. Macri	U.S.	EVP and CFO-IHM	0	0
Paul McNicol	U.S.	EVP, General Counsel, Secretary, Director	0	0
Citicasters Co.	U.S.	Shareholder	100	100

II. INTERMEDIATE PARENT COMPANIES OF LICENSE SUBSIDIARIES

A. Capstar Radio Operating Company is the sole member of Capstar TX LLC, AMFM Texas Licenses, LLC, and AMFM Radio Licenses, LLC. It is a corporation with a principal business of radio broadcasting, and has the following attributable interest holders, all of which use the address 7136 S. Yale Ave., Suite 501, Tulsa, OK, 74136:

(1) Name	(2) Citizenship	(3) Nature of Interest	(4) %Votes	(5) %Equity
Capstar Radio Operating Company	U.S.	--	--	--
Scott T. Bick	U.S.	SVP-Tax	0	0
Richard J. Bressler	U.S.	CFO, President, Director	0	0
Stephen G. Davis	U.S.	SVP-Real Estate, Facilities and Capital Management	0	0
Jeff Littlejohn	U.S.	EVP-Engineering & Systems Integration- IHM	0	0
Steven J. Macri	U.S.	EVP and CFO-IHM	0	0
Paul McNicol	U.S.	EVP, General Counsel, Secretary, Director	0	0
AMFM Texas Broadcasting, LP	U.S.	Shareholder	100	100

B. AMFM Texas Broadcasting, L.P. is the sole shareholder of Capstar Radio Operating Company. It is a limited partnership with a principal business of radio broadcasting and has the following attributable interest holders, all of which use the address 7136 S. Yale Ave., Suite 501, Tulsa, OK, 74136:

(1) Name	(2) Citizenship	(3) Nature of Interest	(4) %Votes	(5) %Equity
AMFM Texas Broadcasting, LP	U.S.	--	--	--
AMFM Broadcasting, Inc.	U.S.	General Partner	100	1
AMFM Texas, LLC	U.S.	Limited Partner	0	99

C. AMFM Texas, LLC is the limited partner of AMFM Texas Broadcasting, L.P. It is a limited liability company with a principal business of radio broadcasting and has the following attributable interest holders, all of which use the address 7136 S. Yale Ave., Suite 501, Tulsa, OK, 74136:

(1) Name	(2) Citizenship	(3) Nature of Interest	(4) %Votes	(5) %Equity
AMFM Texas, LLC	U.S.	--	--	--
Scott T. Bick	U.S.	SVP-Tax	0	0
Richard J. Bressler	U.S.	CFO, President	0	0
Stephen G. Davis	U.S.	SVP-Real Estate, Facilities and Capital Management	0	0
Jeff Littlejohn	U.S.	EVP-Engineering & Systems Integration- IHM	0	0

(1) Name	(2) Citizenship	(3) Nature of Interest	(4) %Votes	(5) %Equity
Steven J. Macri	U.S.	EVP and CFO-IHM	0	0
Paul McNicol	U.S.	EVP, General Counsel, Secretary	0	0
AMFM Broadcasting, Inc.	U.S.	Sole Member	100	100

D. AMFM Broadcasting, Inc. is the sole member of AMFM Broadcasting Licenses, LLC and AMFM Texas, LLC, the general partner of AMFM Texas Broadcasting, L.P., and the 51% unitholder of Los Angeles Broadcasting Partners, LLC. It is a corporation with a principal business of radio broadcasting and has the following attributable interest holders, all of which use the address 7136 S. Yale Ave., Suite 501, Tulsa, OK, 74136:

(1) Name	(2) Citizenship	(3) Nature of Interest	(4) %Votes	(5) %Equity
AMFM Broadcasting, Inc.	U.S.	--	--	--
Scott T. Bick	U.S.	SVP-Tax	0	0
Richard J. Bressler	U.S.	CFO, President, Director	0	0
Stephen G. Davis	U.S.	SVP-Real Estate, Facilities and Capital Management	0	0
Jeff Littlejohn	U.S.	EVP-Engineering & Systems Integration-IHM	0	0
Steven J. Macri	U.S.	EVP and CFO-IHM	0	0
Paul McNicol	U.S.	EVP, General Counsel, Secretary, Director	0	0
AMFM Operating, Inc.	U.S.	Shareholder	100	100

E. AMFM Operating, Inc. is the sole shareholder of AMFM Broadcasting, Inc. It is a corporation with a principal business of radio broadcasting and has the following attributable interest holders, all of which use the address 7136 S. Yale Ave., Suite 501, Tulsa, OK, 74136:

(1) Name	(2) Citizenship	(3) Nature of Interest	(4) %Votes	(5) %Equity
AMFM Operating, Inc.	U.S.	--	--	--
Scott T. Bick	U.S.	SVP-Tax	0	0
Richard J. Bressler	U.S.	CFO, President, Director	0	0
Stephen G. Davis	U.S.	SVP-Real Estate, Facilities and Capital Management	0	0
Jeff Littlejohn	U.S.	EVP-Engineering & Systems Integration-IHM	0	0
Steven J. Macri	U.S.	EVP and CFO-IHM	0	0
Paul McNicol	U.S.	EVP, General Counsel, Secretary, Director	0	0
iHeart Operations, Inc.	U.S.	Shareholder	100	100

F. iHeartMedia + Entertainment, Inc. is the sole member of CC Licenses, LLC. It is a corporation with a principal business of radio broadcasting and has the following attributable interest holders, all of which use the address 7136 S. Yale Ave., Suite 501, Tulsa, OK, 74136:

(1) Name	(2) Citizenship	(3) Nature of Interest	(4) %Votes	(5) %Equity
iHeartMedia + Entertainment, Inc.	U.S.	--	--	--
Scott T. Bick	U.S.	SVP-Tax	0	0
Richard J. Bressler	U.S.	CFO, President, Director	0	0
Stephen G. Davis	U.S.	SVP-Real Estate, Facilities and Capital Management	0	0
Jeff Littlejohn	U.S.	EVP-Engineering & Systems Integration- IHM	0	0
Steven J. Macri	U.S.	EVP and CFO-IHM	0	0
Paul McNicol	U.S.	EVP, General Counsel, Secretary, Director	0	0
CC Broadcast Holdings, Inc.	U.S.	Shareholder	100	100

G. CC Broadcast Holdings, Inc. is the sole shareholder of iHeartMedia + Entertainment, Inc. It is a corporation with a principal business of radio broadcasting and has the following attributable interest holders, all of which use the address 7136 S. Yale Ave., Suite 501, Tulsa, OK, 74136:

(1) Name	(2) Citizenship	(3) Nature of Interest	(4) %Votes	(5) %Equity
CC Broadcast Holdings, Inc.	U.S.	--	--	--
Scott T. Bick	U.S.	SVP-Tax	0	0
Richard J. Bressler	U.S.	CFO, President, Director	0	0
Stephen G. Davis	U.S.	SVP-Real Estate, Facilities and Capital Management	0	0
Jeff Littlejohn	U.S.	EVP-Engineering & Systems Integration- IHM	0	0
Steven J. Macri	U.S.	EVP and CFO-IHM	0	0
Paul McNicol	U.S.	EVP, General Counsel, Secretary, Director	0	0
Clear Channel Broadcasting Licenses, Inc.	U.S.	Shareholder	100	100

H. Citicasters Co. is the sole shareholder of Citicasters Licenses, Inc. It is a corporation with a principal business of radio broadcasting and has the following attributable interest holders, all of which use the address 7136 S. Yale Ave., Suite 501, Tulsa, OK, 74136:

(1) Name	(2) Citizenship	(3) Nature of Interest	(4) %Votes	(5) %Equity
Citicasters Co.	U.S.	--	--	--
Scott T. Bick	U.S.	SVP-Tax	0	0
Richard J. Bressler	U.S.	CFO, President, Director	0	0
Stephen G. Davis	U.S.	SVP-Real Estate, Facilities and Capital Management	0	0
Jeff Littlejohn	U.S.	EVP-Engineering & Systems Integration- IHM	0	0
Steven J. Macri	U.S.	EVP and CFO-IHM	0	0
Paul McNicol	U.S.	EVP, General Counsel, Secretary, Director	0	0
iHeart Operations, Inc.	U.S.	Shareholder	100	100

I. iHeart Operations, Inc. is the sole shareholder of AMFM Operating, Inc., Clear Channel Broadcasting Licenses, Inc. and Citicasters Co. It is a corporation with a principal business of radio broadcasting and has the following attributable interest holders, all of which use the address 7136 S. Yale Ave., Suite 501, Tulsa, OK, 74136:

(1) Name	(2) Citizenship	(3) Nature of Interest	(4) %Votes	(5) %Equity
iHeart Operations, Inc.	U.S.	--	--	--
Scott T. Bick	U.S.	SVP-Tax	0	0
Richard J. Bressler	U.S.	CFO, President, Director	0	0
Steven J. Macri	U.S.	EVP and CFO-IHM	0	0
Paul McNicol	U.S.	EVP, General Counsel, Secretary, Director	0	0
Scott D. Hamilton	U.S.	SVP, CAO, Assistant Secretary	0	0
iHeartCommunications, Inc.	U.S.	Direct Parent	100	100

J. iHeartCommunications, Inc., is the sole shareholder of iHeart Operations, Inc. It is a corporation with a principal business of radio broadcasting and has the following attributable interest holders, all of which use the address 7136 S. Yale Ave., Suite 501, Tulsa, OK, 74136:

(1) Name	(2) Citizenship	(3) Nature of Interest	(4) %Votes	(5) %Equity
iHeartCommunications, Inc.	U.S.	--	--	--
Scott T. Bick	U.S.	SVP-Tax	0	0
Richard J. Bressler	U.S.	CFO, President, Director	0	0

(1) Name	(2) Citizenship	(3) Nature of Interest	(4) %Votes	(5) %Equity
Steven J. Macri	U.S.	EVP and CFO-IHM	0	0
Paul McNicol	U.S.	EVP, General Counsel, Secretary, Director	0	0
Scott D. Hamilton	U.S.	SVP, CAO, Assistant Secretary	0	0
iHeartMedia Capital I, LLC	U.S.	Shareholder	100	100

K. iHeartMedia Capital I, LLC, is the sole shareholder of iHeartCommunications, Inc. It is a limited liability company with a principal business of radio broadcasting and has the following attributable interest holders, all of which use the address 7136 S. Yale Ave., Suite 501, Tulsa, OK, 74136:

(1) Name	(2) Citizenship	(3) Nature of Interest	(4) %Votes	(5) %Equity
iHeartMedia Capital I, LLC	U.S.	--	--	--
Scott T. Bick	U.S.	SVP-Tax	0	0
Richard J. Bressler	U.S.	CFO, President, Manager	0	0
Steven J. Macri	U.S.	EVP and CFO-IHM	0	0
Paul McNicol	U.S.	EVP, General Counsel, Secretary, Manager	0	0
Scott D. Hamilton	U.S.	SVP, CAO, Assistant Secretary	0	0
iHeartMedia Capital II, LLC	U.S.	Sole Member	100	100

L. iHeartMedia Capital II, LLC is the sole member of iHeartMedia Capital I, LLC. It is a limited liability company with a principal business of radio broadcasting and has the following attributable interest holders, all of which use the address 7136 S. Yale Ave., Suite 501, Tulsa, OK, 74136:

(1) Name	(2) Citizenship	(3) Nature of Interest	(4) %Votes	(5) %Equity
iHeartMedia Capital II, LLC	U.S.	--	--	--
Paul McNicol	U.S.	EVP, General Counsel, Secretary, Manager	0	0
Scott D. Hamilton	U.S.	SVP, CAO, Assistant Secretary	0	0
Scott T. Bick	U.S.	SVP-Tax	0	0
Steven J. Macri	U.S.	EVP and CFO-IHM	0	0
Richard J. Bressler	U.S.	CFO, President, Manager	0	0
iHeartMedia, Inc.	U.S.	Sole Member	100	100

III. IHEARTMEDIA, INC.

iHeartMedia, Inc. is the sole member of iHeartMedia Capital II, LLC. It is a corporation with a principal business of radio broadcasting and has the following attributable interest holders, all of which use the address 7136 S. Yale Ave., Suite 501, Tulsa, OK, 74136:³

(1)	(2)	(3)	(4)	(5)
Name	Citizenship	Nature of Interest	%Votes	%Equity
iHeartMedia, Inc.	U.S.	--	--	--
Robert W. Pittman	U.S.	Chairman & CEO Director	<1	<1
Richard J. Bressler	U.S.	President, COO & CFO, Director	<1	<1
Scott D. Hamilton	U.S.	SVP, CAO & Assistant Secretary	<1	<1
Steven J. Macri	U.S.	SVP-Corp. Finance	<1	<1
Paul McNicol	U.S.	EVP, General Counsel & Secretary	<1	<1
Scott T. Bick	U.S.	SVP-Tax	<1	<1
Steve Mills	U.S.	SVP-Chief Information Officer	<1	<1
Wendy Goldberg	U.S.	EVP-Communications	<1	<1
Jessica Marventano	U.S.	SVP-Government Affairs	<1	<1
Duaine Smith	U.S.	SVP & General Auditor	<1	<1
Gayle Troberman	U.S.	EVP & Chief Marketing Officer	<1	<1
Jordan Fasbender	U.S.	SVP & Deputy General Counsel	<1	<1
Melissa Fleming	U.S.	VP-Procurement	<1	<1
Jay Rasulo	U.S.	Director	<1	<1
Gary Barber	U.S.	Director	<1	<1
Brad Gerstner	U.S.	Director	<1	<1
Sean Mahoney	U.S.	Director	<1	<1
Kamakshi Sivaramakrishnan	India	Director	<1	<1

³ The two groups of entities for which iHeart is seeking specific approval will not hold attributable interests in iHeartMedia, Inc. because each consists of a commonly managed group of funds that are “investment companies” as defined in 15 U.S.C. § 80a-3 and, accordingly, will be subject to the 20 percent attribution benchmark under the Commission’s rules. *See* 47 C.F.R. § 73.3555, Note 2(b) (“Investment companies, as defined in 15 U.S.C. § 80a-3, . . . will be considered to have a cognizable interest only if they hold 20% or more of the outstanding voting stock of a corporate broadcast licensee.”); *see also id.* Note 2(h) (discrete ownership interests are aggregated for attribution purposes, and an individual or entity will be deemed to hold a cognizable interest only if “[t]he sum of interests held by or through ‘passive investors’ is equal to or exceeds 20 percent”). iHeart is not seeking specific approval for either group to hold a 20 percent or greater voting interest in iHeart.

IV. LOS ANGELES BROADCASTING PARTNERS, LLC⁴

A. **Los Angeles Broadcasting Partners, LLC** is a limited liability company with a principal business of radio broadcasting, and has the following attributable interest holders, all of which use the address 7136 S. Yale Ave., Suite 501, Tulsa, OK, 74136, unless otherwise indicated:

(1)	(2)	(3)	(4)	(5)
Name	Citizenship	Nature of Interest	%Votes	%Equity
Los Angeles Broadcasting Partners, LLC	U.S.	---	--	--
AMFM Broadcasting, Inc.	U.S.	Unitholder	51	51
LA RadioCo LLC 1000 Vin Scully Ave. Los Angeles, CA 90012	U.S.	Unitholder	49	49
Greg Ashlock	U.S.	Board Member, Manager	0	0
Kevin LeGrett	U.S.	Board Member, Manager	0	0
Don Martin	U.S.	Board Member, Manager	0	0
Tucker Kain 1000 Vin Scully Ave. Los Angeles, CA 90012	U.S.	Board Member	0	0
Lon Rosen 1000 Vin Scully Ave. Los Angeles, CA 90012	U.S.	Board Member	0	0
Scott T. Bick	U.S.	SVP-Tax	0	0
Richard J. Bressler	U.S.	CFO, President	0	0
Stephen G. Davis	U.S.	SVP-Real Estate, Facilities and Capital Management	0	0
Jeff Littlejohn	U.S.	EVP-Engineering & Systems Integration- IHM	0	0
Steven J. Macri	U.S.	EVP and CFO-IHM	0	0
Paul McNicol	U.S.	EVP, General Counsel, Secretary	0	0

⁴ Information in this section for all entities other than Los Angeles Broadcasting Partners, LLC was provided by advisors to LA RadioCo LLC.

B. LA RadioCo LLC is the 49% unitholder of Los Angeles Broadcasting Partners, LLC. It is a limited liability company with a principal business of radio broadcasting and has the following attributable interest holders:

(1) Name	(2) Citizenship	(3) Nature of Interest	(4) %Votes	(5) %Equity
LA RadioCo LLC 1000 Vin Scully Ave. Los Angeles, CA 90012	U.S.	--	--	--
American Media & Entertainment, LLC 227 West Monroe, Suite 4800 Chicago, IL 60606	U.S.	Sole Member	100	100

C. American Media & Entertainment, LLC is the sole member of LA RadioCo LLC. It is a limited liability company and has the following attributable interest holders, all of which use the address 227 West Monroe, Suite 4800, Chicago, IL 60606, unless otherwise indicated:

(1) Name	(2) Citizenship	(3) Nature of Interest	(4) %Votes	(5) %Equity
American Media & Entertainment, LLC	U.S.	--	--	--
Security Benefit Life Insurance Company* One Security Benefit Place Topeka, KS 66636	U.S.	Member	36.93	36.93
Guggenheim Life and Annuity Company* 401 Pennsylvania Parkway, Suite 300 Indianapolis, IN 46280	U.S.	Member	30.77	30.77
EquiTrust Life Insurance Company* 7100 Westown Parkway, Suite 200 West Des Moines, IA 50266	U.S.	Member	3.08	3.08
LADH, LLC	U.S.	Member	29.22	29.22
Mark Walter	U.S.	Managing Member	0	0
Todd Boehly 600 Steamboat Road, 2nd Floor Greenwich, CT 06830	U.S.	Vice President	0	0
Stan Kasten 1000 Vin Scully Ave. Los Angeles, CA 90012	U.S.	Vice President	0	0
Tucker Kain 1000 Vin Scully Ave. Los Angeles, CA 90012	U.S.	Vice President	0	0
Lon Rosen 1000 Vin Scully Ave. Los Angeles, CA 90012	U.S.	Vice President	0	0

* Regulated insurance company subject to annual public filing requirements

* Regulated insurance company subject to annual public filing requirements

* Regulated insurance company subject to annual public filing requirements

D. LADH, LLC has a 29.22% interest in American Media & Entertainment, LLC. It is a limited liability company and has the following attributable interest holders:

(1) Name	(2) Citizenship	(3) Nature of Interest	(4) %Votes	(5) %Equity
LADH, LLC	U.S.	--	--	--
Robert L. Patton, Jr. 5201 Camp Bowie Blvd., Suite 200 Fort Worth, TX 76107	U.S.	Member	21.05	21.05
OFP Investments, LLC 227 West Monroe, Suite 4800 Chicago, IL 60606	U.S.	Member	21.04	21.04
LADH Manager, LLC 227 West Monroe, Suite 4800 Chicago, IL 60606	U.S.	Managing Member	.01	.01
Leadoff Investments, LLC 600 Steamboat Road, 2nd Floor Greenwich CT 06830	U.S.	Member	21.05	21.05
June Bug – GBM Land Holding LLC 9100 Wilshire Blvd. Ste 1000W Beverly Hills, CT 90212	U.S.	Member	10.53	10.53
Allott Enterprises, LLC 433 N Camden Dr. #600 Beverly Hills, CA 90210	U.S.	Member	5.26	5.26
Guggenheim Life and Annuity Company* 401 Pennsylvania Parkway, Suite 300 Indianapolis, IN 46280	U.S.	Member	7.37	7.37
Paragon Life Insurance Company of Indiana* 401 Pennsylvania Parkway, Suite 300 Indianapolis, IN 46280	U.S.	Member	6.32	6.32
Security Benefit Life Insurance Company* One Security Benefit Place Topeka, KS 66636	U.S.	Member	7.37	7.37
Tucker Kain 1000 Vin Scully Ave. Los Angeles, CA 90012	U.S.	Vice President	0	0
Alejandro Longoria 227 West Monroe, Suite 4800 Chicago, IL 60606	U.S.	Vice President	0	0
Daniel Musker 227 West Monroe, Suite 4800 Chicago, IL 60606	U.S.	Vice President	0	0

E. OFP Investments, LLC has a 21.04% interest in LADH, LLC. It is a limited liability company and has the following attributable interest holders, all of which use the address 227 West Monroe, Suite 4800 Chicago, IL 60606:

(1) Name	(2) Citizenship	(3) Nature of Interest	(4) %Votes	(5) %Equity
Mark Walter	U.S.	Investor	100	100

* Regulated insurance company subject to annual public filing requirements

F. LADH Manager, LLC has a .01% interest in LADH, LLC. It is a limited liability company and has the following attributable interest holders, all of which use the address 227 West Monroe, Suite 4800 Chicago, IL 60606:

(1)	(2)	(3)	(4)	(5)
Name	Citizenship	Nature of Interest	%Votes	%Equity
Mark Walter	U.S.	Investor	100	100

G. Leadoff Investments, LLC which has a 21.05% interest in LADH, LLC. It is a limited liability company and has the following attributable interest holders, all of which use the address 600 Steamboat Road, 2nd Floor, Greenwich CT 06830:

(1)	(2)	(3)	(4)	(5)
Name	Citizenship	Nature of Interest	%Votes	%Equity
Todd Boehly	U.S.	Investor	100	100

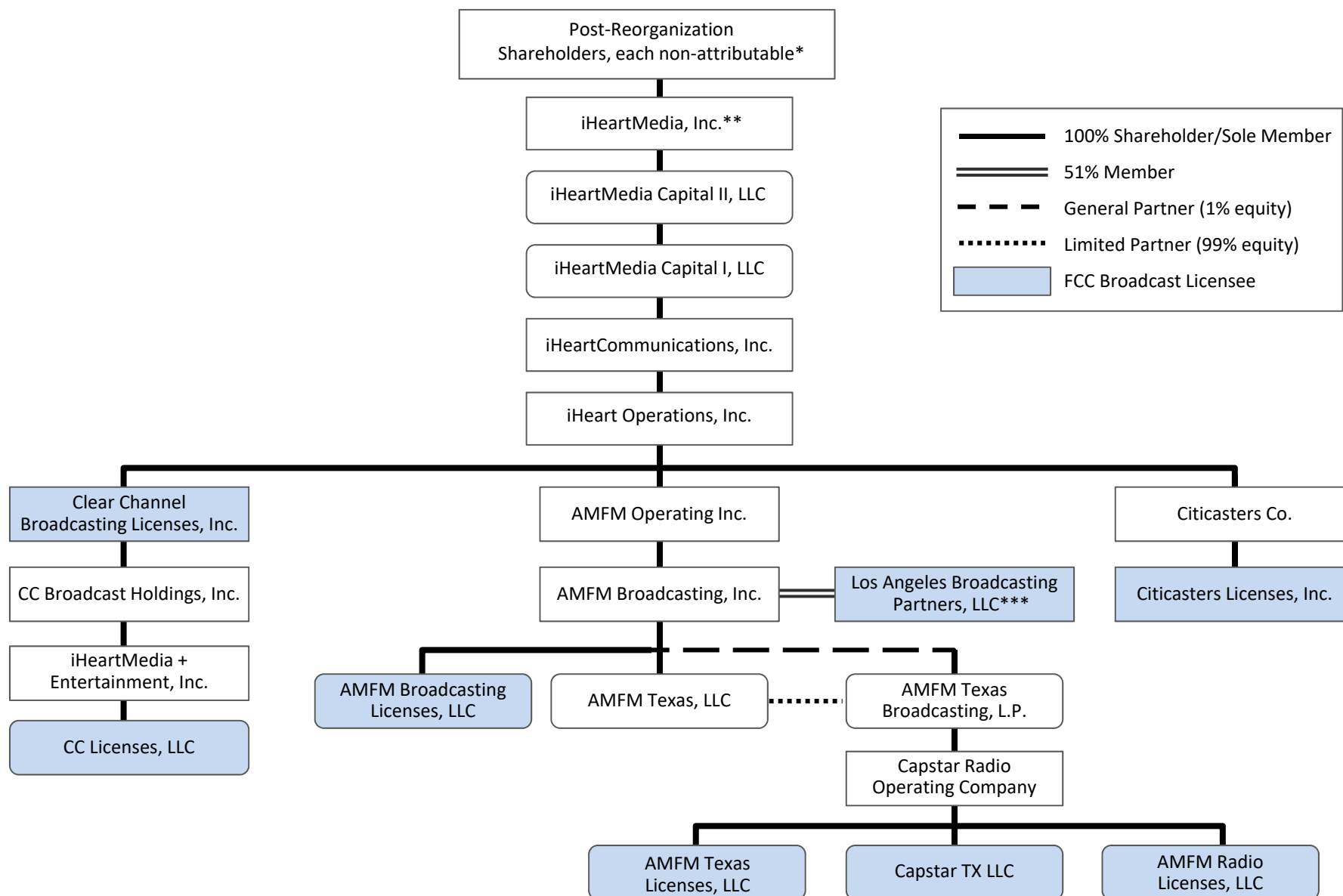
H. June Bug – GBM Land Holding, LLC has a 10.53% interest in LADH, LLC. It is a limited liability company and has the following attributable interest holders, all of which use the address 9100 Wilshire Blvd. Ste 1000W, Beverly Hills, CA 90212:

(1)	(2)	(3)	(4)	(5)
Name	Citizenship	Nature of Interest	%Votes	%Equity
Earvin Johnson	U.S.	Investor	100	100

I. Allott Enterprises, LLC has a 5.26% interest in LADH, LLC. It is a limited liability company and has the following attributable interest holders, all of which use the address 433 N Camden Dr. #600 Beverly Hills, CA 90210:

(1)	(2)	(3)	(4)	(5)
Name	Citizenship	Nature of Interest	%Votes	%Equity
Peter Guber	U.S.	Investor	100	100

Post-Declaratory Ruling Ownership and Control Structure



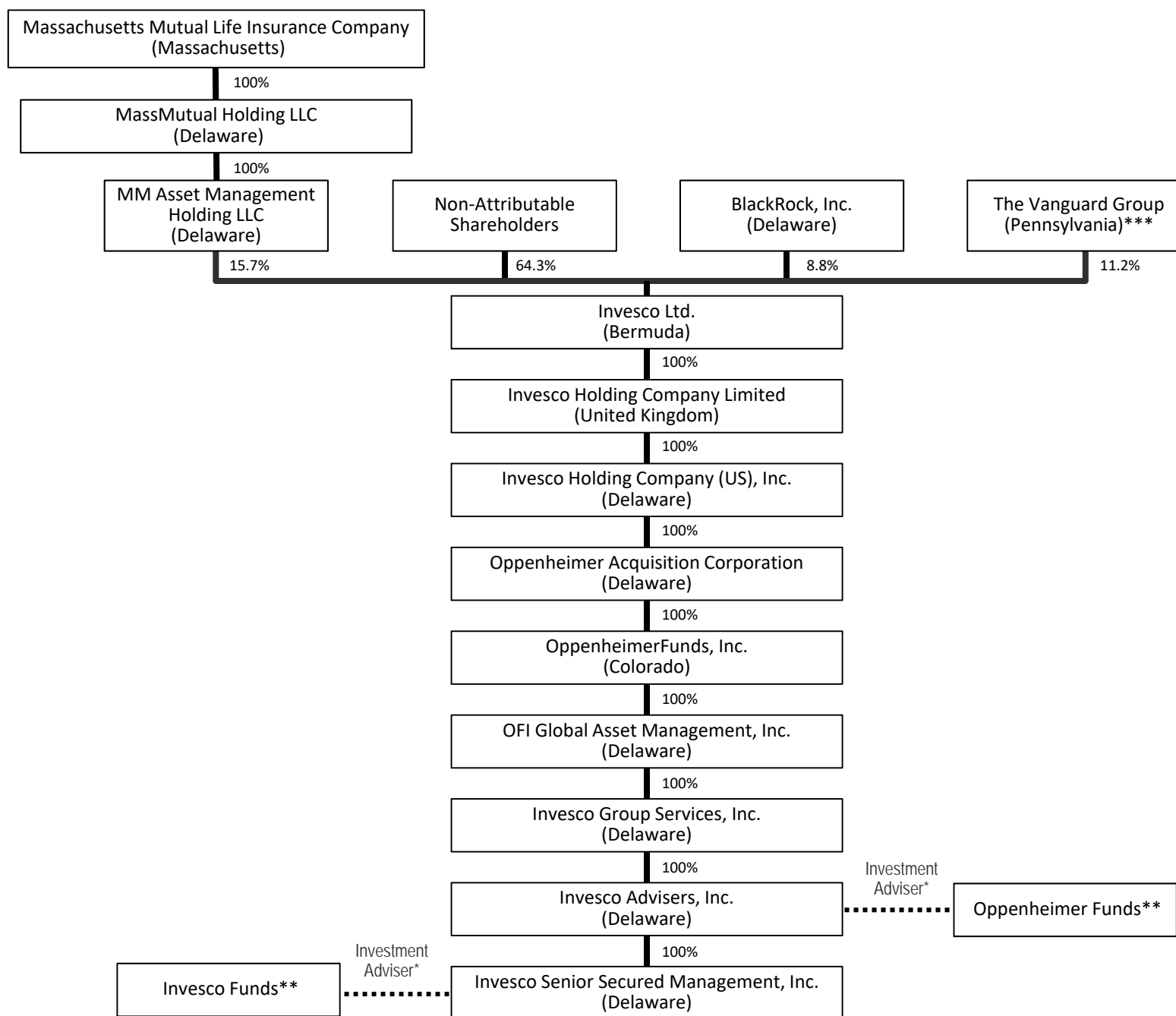
*For the ownership and control structure of the Invesco Ltd.-related parties for which this Petition for Declaratory Ruling seeks specific approval, see Exhibit C-2.

** iHeartMedia, Inc. and all other entities depicted in this structure chart are organized in the United States.

***For the ownership and control structure of Los Angeles Broadcasting Partners, LLC, see Exhibit C-3.

Invesco Ltd. Ownership and Control Structure

Exhibit C-2

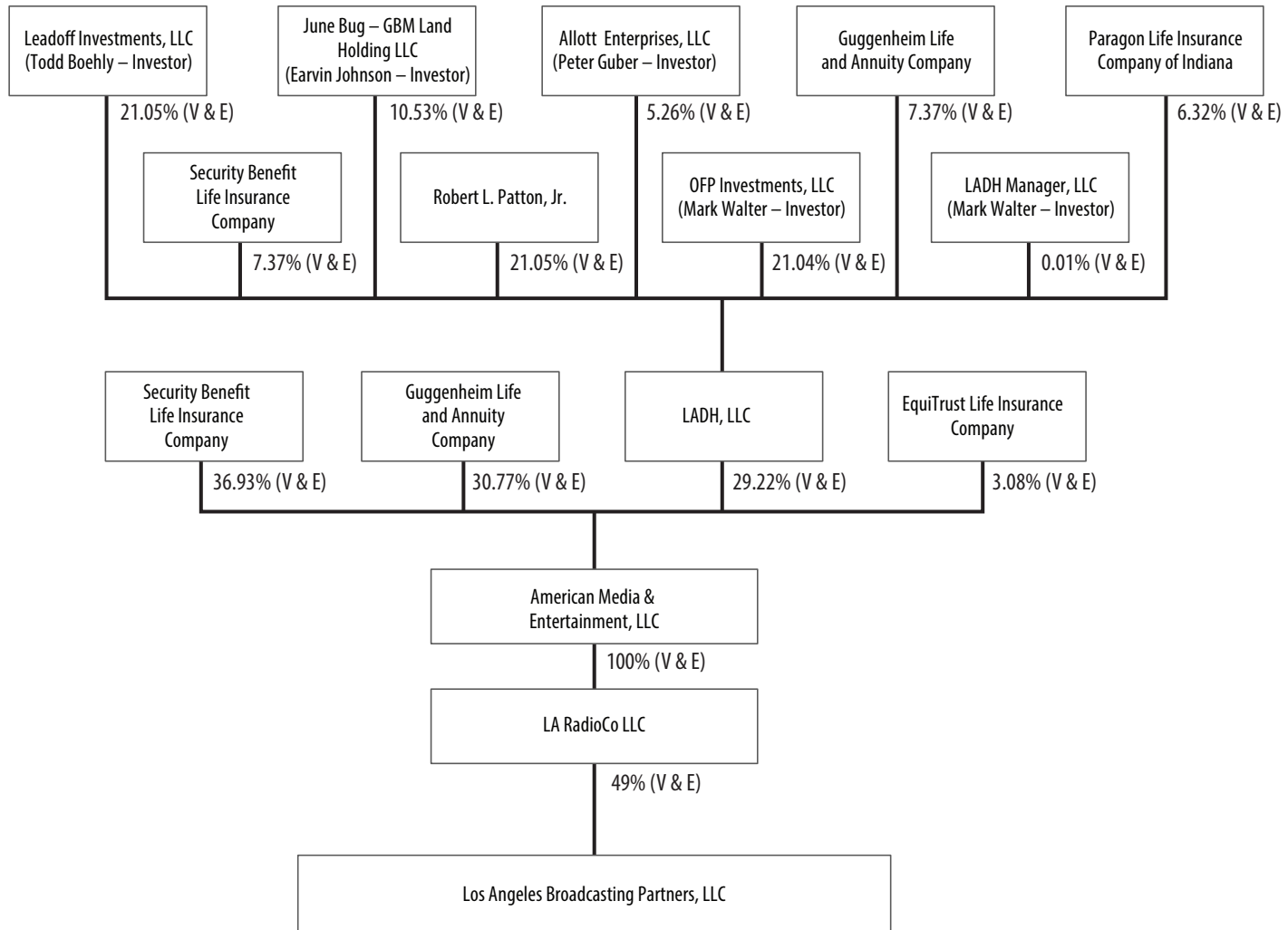


* The investment advisers to the funds holding common stock in iHeartMedia, Inc. make investment decisions for the funds and vote the shares held by funds.

**None individually requiring specific approval or holding an attributable interest in iHeartMedia, Inc.

*** In addition to its 11.2% direct interest in Invesco Ltd., The Vanguard Group holds an indirect interest in Invesco Ltd. through direct and indirect interests in BlackRock, Inc. which, as noted above, holds an 8.8% direct interest in Invesco Ltd.

Los Angeles Broadcasting Partners, LLC Ownership and Control Structure



REDACTED -- FOR PUBLIC INSPECTION

Exhibit D

Significant Holders of Interests in iHeartMedia, Inc.¹

Investment Advisor and/or Parent Company	Entity Type	Address	Funds Jurisdiction	Funds Pro Forma Voting Interest in iHeartMedia Inc. ²	Funds Pro Forma Equity Interest in iHeartMedia Inc.
[REDACTED]	U.K. Public Limited Company	[REDACTED]	United Kingdom	1.0890%	1.0369%
[REDACTED]	Delaware Limited Partnership	[REDACTED]	United States	2.0117%	1.9154%
			Canada	0.0090%	0.0086%
			Cayman Islands	0.0352%	0.0336%
			Ireland	0.0530%	0.0506%
[REDACTED]	Delaware LLC	[REDACTED]	United States	1.6438%	1.5652%
[REDACTED]	Swiss Joint Stock Corporation ³	[REDACTED]	United States	1.0506%	1.0004%
[REDACTED]	Delaware Limited Partnership	[REDACTED]	United States	2.1095%	2.0140%
[REDACTED]	Delaware Limited Partnership	[REDACTED]	United States	2.4559%	2.3385%
			Cayman Islands	1.4675%	1.3973%

¹ Assuming all Special Warrants have been exchanged for Class A Common Stock following receipt of a declaratory ruling. Unless otherwise noted, information reported herein is based upon information provided in certifications received in connection with the bankruptcy of iHeartMedia, Inc. ("iHeart"). For the purposes of (1) making distributions of Class A Common Stock, Class B Common Stock, and Special Warrants at iHeart's emergence, and (2) calculating the percentages contained herein, the greater of an entity's reported foreign voting percentage or foreign equity percentage has been utilized. In addition, entities that did not supply foreign voting or foreign equity percentages in a certification were treated as having 100 percent foreign voting or 100 percent foreign equity, as applicable.

² The foreign voting and foreign equity percentages provided herein differ because certain holders received Class B Common Stock, which is non-voting for FCC purposes and is included only in the total equity percentage, in lieu of Class A Common Stock (which is included in both the voting and equity percentage), to ensure that they remained non-attributable under the FCC's media ownership rules and that iHeart's aggregate foreign voting percentage did not exceed 22.5 percent at emergence. It is not anticipated that the exchange following a declaratory ruling will result in the conversion of Class B shares to Class A shares.

³ Information obtained from the Form 20-F filed by [REDACTED] with the Securities and Exchange Commission on March 22, 2019.

REDACTED -- FOR PUBLIC INSPECTION

Investment Advisor and/or Parent Company	Entity Type	Address	Funds Jurisdiction	Funds Pro Forma Voting Interest in iHeartMedia Inc. ²	Funds Pro Forma Equity Interest in iHeartMedia Inc.
			British Virgin Islands	1.3746%	1.3089%
[REDACTED]	Delaware LLC	[REDACTED]	United States	8.1894%	7.9292%
			Canada	0.0023%	0.0022%
			Luxembourg	0.1120%	0.1071%
			United Kingdom	0.0018%	0.0017%
[REDACTED]	Delaware LLC ⁴	[REDACTED]	Cayman Islands	1.3964%	1.3296%
[REDACTED]	Delaware Limited Partnership	[REDACTED]	Cayman Islands	1.4045%	1.3373%
[REDACTED]	Bermuda Limited Company with Exempted Status ⁵	[REDACTED]	United States ⁷	5.2026%	4.9537%
			Canada	0.0189%	0.0180%
			Cayman Islands	0.0427%	0.0406%
			Denmark	0.0485%	0.0462%
			Luxembourg	0.8876%	0.8452%
			United Kingdom	0.0248%	0.0236%

⁴ Information obtained from the Delaware Department of State Division of Corporations.

⁵ Information provided by [REDACTED].

⁶ Information provided by [REDACTED].

⁷ [REDACTED]

REDACTED -- FOR PUBLIC INSPECTION

Investment Advisor and/or Parent Company	Entity Type	Address	Funds Jurisdiction	Funds Pro Forma Voting Interest in iHeartMedia Inc. ²	Funds Pro Forma Equity Interest in iHeartMedia Inc.
[REDACTED]	Delaware Corporation	[REDACTED]	United States	1.3087%	1.2461%
			Australia	0.0007%	0.0007%
			Canada	0.0027%	0.0026%
			Cayman Islands	0.0331%	0.0315%
			Hong Kong	0.0394%	0.0375%
			Ireland	0.0069%	0.0065%
			Luxembourg	0.6650%	0.6332%
			Switzerland	0.0254%	0.0242%
			United Kingdom	0.0166%	0.0158%
			Unknown ⁸	0.0233%	0.0222%
[REDACTED]	Delaware Corporation	[REDACTED]	United States	0.3144%	4.8052%
[REDACTED]	Delaware Limited Partnership ⁹	[REDACTED]	United States	1.7035%	1.6221%
			Luxembourg	0.0120%	0.0115%
			Saudi Arabia	0.0061%	0.0058%
[REDACTED]	Delaware Corporation	[REDACTED]	United States	0.5462%	0.5204%
			Cayman Islands	1.4580%	1.3907%
[REDACTED]	Delaware LLC	[REDACTED]	United States	19.8174%	18.9035%
			Bermuda	1.5872%	1.5140%
			Canada	1.9496%	1.8596%
			Denmark	0.0038%	0.0036%
			Ireland	8.4090%	8.0212%
[REDACTED]	Delaware LLC	[REDACTED]	Cayman Islands	1.7228%	1.6404%
[REDACTED]	California LLC ¹⁰	[REDACTED]	United States	2.0120%	1.9157%

⁸ This row contains information concerning funds or entities for which jurisdiction information was not reported and could not be readily ascertained, and which have been treated as having 100 percent foreign voting and equity.

⁹ Information obtained from the Delaware Department of State Division of Corporations.

¹⁰ Information obtained from the California Secretary of State.

Percentages in the table were calculated by advisors to iHeartMedia, Inc.

REDACTED -- FOR PUBLIC INSPECTION

Investment Advisor and/or Parent Company	Entity Type	Address	Funds Jurisdiction	Funds Pro Forma Voting Interest in iHeartMedia Inc. ²	Funds Pro Forma Equity Interest in iHeartMedia Inc.
			Canada	0.0340%	0.0324%
			Cayman Islands	0.6988%	0.6665%
			Denmark	0.0997%	0.0951%
			Luxembourg	0.0606%	0.0578%
[REDACTED]	Maryland Corporation ¹¹	[REDACTED]	United States	1.6033%	1.5266%
			Canada	0.0114%	0.0109%
			Denmark	0.0067%	0.0064%
			Luxembourg	0.1219%	0.1160%
[REDACTED]	Delaware LLC	[REDACTED]	United States	1.8574%	1.7686%
			Cayman Islands	1.0436%	0.9937%
[REDACTED]	Delaware Limited Partnership ¹²	[REDACTED]	Delaware ¹⁴	0%	2.0000% ¹⁵

¹¹ Information obtained from the Maryland Department of Assessments and Taxation Records.

¹² Information obtained from the Delaware Department of State Division of Corporations.

¹³ Information obtained from [REDACTED]

¹⁴ Information obtained from the Delaware Department of State Division of Corporations.

¹⁵ The interests reported for [REDACTED] represent preferred stock that was issued at iHeart's emergence in one of its wholly owned indirect subsidiaries, iHeartOperations, Inc., to an entity that was treated as 100 percent foreign for distribution purposes. This preferred stock carries no current voting rights and was intended to represent approximately 2 percent of the total equity of iHeartOperations, Inc. at the time of its issuance.

EXHIBIT E

Estimate of Aggregate Foreign Ownership

(47 C.F.R. § 1.5001(h)(1))

iHeartMedia, Inc. (“iHeart”) estimates that foreign ownership of its capital stock following a grant of this Petition which would permit such ownership would, on a direct and/or indirect basis, be approximately 70.5 percent as to voting and 63.9 percent as to equity. These estimates are based upon certifications obtained by iHeart from holders of claims which were entitled to receive distributions of Class A Common Stock, Class B Common Stock, and/or Special Warrants at its emergence from bankruptcy, as well as additional information obtained from certain of iHeart’s stockholders and calculations performed by iHeart’s advisors. These estimates also assume the exchange of all Special Warrants for common stock pursuant to the Warrant Agreement that governs the Special Warrants. The Warrant Agreement provides for new certifications prior to such exchanges becoming effective.

EXHIBIT F

Specific Approval Parties and Their Attributable Interest Holders

(47 C.F.R. § 1.5001(i)-(j))

Specific Approval Parties and Their Attributable Interest Holders

(47 C.F.R. § 1.5001(i)-(j))

Invesco Holding Company Limited

Information regarding Invesco Holding Company Limited

Name	Invesco Holding Company Limited
Address	Two Peachtree Pointe 1555 Peachtree Street, N.E., Suite 1800 Atlanta, GA 30309
Citizenship (individual) or place of organization (entity)	United Kingdom
Type of business organization (entity)	Private limited company
Principal business	Holding company
% of votes (rounded to the nearest %) proposed to be held	Up to 19.99%
% of equity (rounded to the nearest %) proposed to be held	Up to 19.99%

Information regarding individuals or entities directly holding an attributable interest in Invesco Holding Company Limited

Name	Address	Citizenship (individual) or place of organization (entity)
Invesco Ltd.	Two Peachtree Pointe 1555 Peachtree Street, N.E., Suite 1800 Atlanta, GA 30309	Bermuda
Jeffrey G. Callahan	Two Peachtree Pointe 1555 Peachtree Street, NE Suite 1800 Atlanta, GA 30309	United States
Annette J. Lege	Two Peachtree Pointe 1555 Peachtree Street, NE Suite 1800 Atlanta, GA 30309	United States
Loren M. Starr	Two Peachtree Pointe 1555 Peachtree Street, NE Suite 1800 Atlanta, GA 30309	United States
Anne Gerry	Two Peachtree Pointe 1555 Peachtree Street, NE Suite 1800 Atlanta, GA 30309	United States
Robert H. Rigsby	Two Peachtree Pointe 1555 Peachtree Street, NE Suite 1800 Atlanta, GA 30309	United States

Invesco Ltd.*Information regarding Invesco Ltd.*

Name	Invesco Ltd.
Address	Two Peachtree Pointe 1555 Peachtree Street, N.E., Suite 1800 Atlanta, GA 30309
Citizenship (individual) or place of organization (entity)	Bermuda
Type of business organization (entity)	Limited company with exempted status
Principal business	Invesco Ltd. is a public independent global investment management company regulated by the Securities and Exchange Commission and publicly traded on the New York Stock Exchange as “IVZ”
% of votes (rounded to the nearest %) proposed to be held	Up to 19.99%
% of equity (rounded to the nearest %) proposed to be held	Up to 19.99%

Information regarding individuals or entities directly holding an attributable interest in Invesco Ltd.

Name	Address	Citizenship (individual) or place of organization (entity)
Sarah E. Beshar	Two Peachtree Pointe 1555 Peachtree Street, N.E., Suite 1800 Atlanta, GA 30309	United States
Joseph R. Canion	Two Peachtree Pointe 1555 Peachtree Street, N.E., Suite 1800 Atlanta, GA 30309	United States
Martin L. Flanagan	Two Peachtree Pointe 1555 Peachtree Street, N.E., Suite 1800 Atlanta, GA 30309	United States
William F. Glavin, Jr.	Two Peachtree Pointe 1555 Peachtree Street, N.E., Suite 1800 Atlanta, GA 30309	United States
C. Robert Henrikson	Two Peachtree Pointe 1555 Peachtree Street, N.E., Suite 1800 Atlanta, GA 30309	United States
Denis Kessler	Two Peachtree Pointe 1555 Peachtree Street, N.E., Suite 1800 Atlanta, GA 30309	France
Sir Nigel Sheinwald	Two Peachtree Pointe 1555 Peachtree Street, N.E., Suite 1800 Atlanta, GA 30309	United Kingdom

Name	Address	Citizenship (individual) or place of organization (entity)
G. Richard Wagoner, Jr.	Two Peachtree Pointe 1555 Peachtree Street, N.E., Suite 1800 Atlanta, GA 30309	United States
Phoebe A. Wood	Two Peachtree Pointe 1555 Peachtree Street, N.E., Suite 1800 Atlanta, GA 30309	United States
Kevin M. Carome	Two Peachtree Pointe 1555 Peachtree Street, N.E., Suite 1800 Atlanta, GA 30309	United States
Mark Giuliano	Two Peachtree Pointe 1555 Peachtree Street, N.E., Suite 1800 Atlanta, GA 30309	United States
Annette J. Lege	Two Peachtree Pointe 1555 Peachtree Street, N.E., Suite 1800 Atlanta, GA 30309	United States
Andrew T.S. Lo	Two Peachtree Pointe 1555 Peachtree Street, N.E., Suite 1800 Atlanta, GA 30309	United States
Gregory G. McGreevey	Two Peachtree Pointe 1555 Peachtree Street, N.E., Suite 1800 Atlanta, GA 30309	United States
Colin D. Meadows	Two Peachtree Pointe 1555 Peachtree Street, N.E., Suite 1800 Atlanta, GA 30309	United States
Kevin Oldham	Two Peachtree Pointe 1555 Peachtree Street, N.E., Suite 1800 Atlanta, GA 30309	Canada
Robert H. Rigsby	Two Peachtree Pointe 1555 Peachtree Street, N.E., Suite 1800 Atlanta, GA 30309	United States
Andrew R. Schlossberg	Two Peachtree Pointe 1555 Peachtree Street, N.E., Suite 1800 Atlanta, GA 30309	United States
Doug J. Sharp	Two Peachtree Pointe 1555 Peachtree Street, N.E., Suite 1800 Atlanta, GA 30309	United States
Loren M. Starr	Two Peachtree Pointe 1555 Peachtree Street, N.E., Suite 1800 Atlanta, GA 30309	United States

Name	Address	Citizenship (individual) or place of organization (entity)
Philip A. Taylor	Two Peachtree Pointe 1555 Peachtree Street, N.E., Suite 1800 Atlanta, GA 30309	Canada
MM Asset Management Holding LLC ¹	1295 State Street Springfield, MA 01111	United States (Delaware)
The Vanguard Group ²	100 Vanguard Boulevard Malvern, PA 19355	United States (Pennsylvania)
BlackRock, Inc. ³	55 East 52 nd Street New York, NY 10055	United States (Delaware)

MM Asset Management Holding LLC

Information regarding individuals or entities directly holding an attributable interest in MM Asset Management Holding LLC, which directly holds an attributable interest in Invesco Ltd.

Name	Address	Citizenship (individual) or place of organization (entity)
MassMutual Holding LLC	1295 State Street Springfield, MA 01111	United States (Delaware)

MassMutual Holding LLC

Information regarding individuals or entities directly holding an attributable interest in MassMutual Holding LLC, which indirectly holds an attributable interest in Invesco Ltd.

Name	Address	Citizenship (individual) or place of organization (entity)
Massachusetts Mutual Life Insurance Company	1295 State Street Springfield, MA 01111	United States (Massachusetts)

¹ MM Asset Management Holding LLC holds a 15.7 percent interest in Invesco Ltd. and is wholly owned by Mass Mutual Holding LLC, which is wholly owned by Massachusetts Mutual Life Insurance Company – all according to the Schedule 13D filed with the Securities and Exchange Commission on June 3, 2019 by Massachusetts Mutual Life Insurance Company, MassMutual Holding LLC, and MM Asset Management Holding LLC.

² As of February 15, 2019, The Vanguard Group beneficially owned 11.2 percent of Invesco Ltd.'s common shares according to Invesco Ltd.'s Schedule 14A filed with the Securities and Exchange Commission on March 25, 2019.

³ As of February 15, 2019, BlackRock, Inc. beneficially owned 8.8 percent of Invesco Ltd.'s common shares according to Invesco Ltd.'s Schedule 14A filed with the Securities and Exchange Commission on March 25, 2019.

Massachusetts Mutual Life Insurance Company

Information regarding individuals or entities directly holding an attributable interest in Massachusetts Mutual Life Insurance Company, which indirectly holds an attributable interest in Invesco Ltd.

Name	Address	Citizenship (individual) or place of organization (entity)
Roger W. Crandall	1295 State Street Springfield, MA 01111	United States
H. Todd Stitzer	1295 State Street Springfield, MA 01111	United States and United Kingdom
Karen Bechtel	1295 State Street Springfield, MA 01111	United States
Mark T. Bertolini	1295 State Street Springfield, MA 01111	United States
Kathleen A. Corbet	1295 State Street Springfield, MA 01111	United States
James H. DeGraffenreidt, Jr.	1295 State Street Springfield, MA 01111	United States
Isabella D. Goren	1295 State Street Springfield, MA 01111	United States
Jeffery M Leiden	1295 State Street Springfield, MA 01111	United States
Laura J. Sen	1295 State Street Springfield, MA 01111	United States
William T. Spitz	1295 State Street Springfield, MA 01111	United States
Susan Cicco	1295 State Street Springfield, MA 01111	United States
Timothy Corbett	1295 State Street Springfield, MA 01111	United States
Michael Fanning	1295 State Street Springfield, MA 01111	United States
Pia Flanagan	1295 State Street Springfield, MA 01111	United States
Geoffrey Craddock	1295 State Street Springfield, MA 01111	United States and United Kingdom
Michael O'Connor	1295 State Street Springfield, MA 01111	United States
Gareth Ross	1295 State Street Springfield, MA 01111	United States and Ireland
Elizabeth Ward	1295 State Street Springfield, MA 01111	United States
Eddie Ahmed	1295 State Street Springfield, MA 01111	Australia
Tom Finke	1295 State Street Springfield, MA 01111	United States

The Vanguard Group

Information regarding individuals or entities directly holding an attributable interest in The Vanguard Group, which directly and indirectly holds an attributable interest in Invesco Ltd.⁴

Name	Address	Citizenship (individual) or place of organization (entity)
Mortimer J. Buckley	100 Vanguard Boulevard Malvern, PA 19355	
Emerson U. Fullwood	100 Vanguard Boulevard Malvern, PA 19355	
Amy Gutmann	100 Vanguard Boulevard Malvern, PA 19355	
F. Joseph Loughrey	100 Vanguard Boulevard Malvern, PA 19355	
Mark Loughridge	100 Vanguard Boulevard Malvern, PA 19355	
Scott C. Malpass	100 Vanguard Boulevard Malvern, PA 19355	
Deanna Mulligan	100 Vanguard Boulevard Malvern, PA 19355	
André F. Perold	100 Vanguard Boulevard Malvern, PA 19355	
Sarah Bloom Raskin	100 Vanguard Boulevard Malvern, PA 19355	
Peter F. Volanakis	100 Vanguard Boulevard Malvern, PA 19355	
Joseph P. Brennan	100 Vanguard Boulevard Malvern, PA 19355	
Gregory Davis	100 Vanguard Boulevard Malvern, PA 19355	
John James	100 Vanguard Boulevard Malvern, PA 19355	
Martha G. King	100 Vanguard Boulevard Malvern, PA 19355	
John T. Marcante	100 Vanguard Boulevard Malvern, PA 19355	
Chris D. McIsaac	100 Vanguard Boulevard Malvern, PA 19355	
James M. Norris	100 Vanguard Boulevard Malvern, PA 19355	
Thomas M. Rampulla	100 Vanguard Boulevard Malvern, PA 19355	
Karin A. Risi	100 Vanguard Boulevard Malvern, PA 19355	
Anne E. Robinson	100 Vanguard Boulevard Malvern, PA 19355	
Michael Rollings	100 Vanguard Boulevard Malvern, PA 19355	

⁴ Information about The Vanguard Group's directors and officers obtained from <https://about.vanguard.com/who-we-are/our-leaders/>, which does not report citizenship information.

BlackRock, Inc.

Information regarding individuals or entities directly holding an attributable interest in BlackRock, Inc., which directly and indirectly holds an attributable interest in Invesco Ltd.⁵

Name	Address	Citizenship (individual) or place of organization (entity)
Laurence D. Fink	55 East 52 nd Street New York, NY 10055	
Bader M. Alsaad	55 East 52 nd Street New York, NY 10055	
Mathis Cabiallavetta	55 East 52 nd Street New York, NY 10055	
Pamela Daley	55 East 52 nd Street New York, NY 10055	
William S. Demchak	55 East 52 nd Street New York, NY 10055	
Jessica Einhorn	55 East 52 nd Street New York, NY 10055	
William E. Ford	55 East 52 nd Street New York, NY 10055	
Fabrizio Freda	55 East 52 nd Street New York, NY 10055	
Murry S. Gerber	55 East 52 nd Street New York, NY 10055	
Margaret L. Johnson	55 East 52 nd Street New York, NY 10055	
Robert S. Kapito	55 East 52 nd Street New York, NY 10055	
Cheryl Mills	55 East 52 nd Street New York, NY 10055	
Gordon M. Nixon	55 East 52 nd Street New York, NY 10055	
Charles H. Robbins	55 East 52 nd Street New York, NY 10055	
Ivan G. Seidenberg	55 East 52 nd Street New York, NY 10055	
Marco Antonio Slim Domit	55 East 52 nd Street New York, NY 10055	
Susan L. Wagner	55 East 52 nd Street New York, NY 10055	
Mark Wilson	55 East 52 nd Street New York, NY 10055	
Geraldine Buckingham	55 East 52 nd Street New York, NY 10055	
Edwin N. Conway	55 East 52 nd Street New York, NY 10055	
Frank Cooper III	55 East 52 nd Street New York, NY 10055	
Sir Robert W. Fairbairn	55 East 52 nd Street New York, NY 10055	

⁵ Information about BlackRock, Inc.'s directors and officers obtained from <http://ir.blackrock.com/board-of-directors> and <https://www.blackrock.com/corporate/about-us/leadership>, which do not report citizenship information.

Name	Address	Citizenship (individual) or place of organization (entity)
Rob L. Goldstein	55 East 52 nd Street New York, NY 10055	
Ben Golub	55 East 52 nd Street New York, NY 10055	
Phillipp Hildebrand	55 East 52 nd Street New York, NY 10055	
J. Richard Kushel	55 East 52 nd Street New York, NY 10055	
Rachel Lord	55 East 52 nd Street New York, NY 10055	
Mark McCombe	55 East 52 nd Street New York, NY 10055	
Christopher Meade	55 East 52 nd Street New York, NY 10055	
Barbara G. Novick	55 East 52 nd Street New York, NY 10055	
Salim Ramji	55 East 52 nd Street New York, NY 10055	
Gary Shedlin	55 East 52 nd Street New York, NY 10055	
Jeffrey A. Smith, Ph.D.	55 East 52 nd Street New York, NY 10055	
Derek Stein	55 East 52 nd Street New York, NY 10055	
Mark K. Wiedman	55 East 52 nd Street New York, NY 10055	
Mark D. Wiseman	55 East 52 nd Street New York, NY 10055	
The PNC Financial Services Group, Inc. and affiliates ⁶	The Tower at PNC Plaza 300 Fifth Avenue Pittsburgh, PA 15222	United States (Pennsylvania)
The Vanguard Group, Inc. ⁷	100 Vanguard Boulevard Malvern, PA 19355	United States (Pennsylvania)
Capital World Investors (U.S.) ⁸	333 South Hope Street 55th Floor Los Angeles, CA 90071	United States (Delaware)

⁶ As of March 31, 2019, The PNC Financial Services Group, Inc. and affiliates beneficially owned 21.59 percent of BlackRock, Inc.'s outstanding common stock according to BlackRock, Inc.'s 2019 Proxy Statement at 43 (Apr. 12, 2019), available at <http://ir.blackrock.com/annual-reports-and-proxy-statements>.

⁷ As of March 31, 2019, The Vanguard Group, Inc. beneficially owned 5.63 percent of BlackRock, Inc.'s outstanding common stock according to BlackRock, Inc.'s 2019 Proxy Statement at 43 (Apr. 12, 2019), available at <http://ir.blackrock.com/annual-reports-and-proxy-statements>.

⁸ As of March 31, 2019, Capital World Investors (U.S.) beneficially owned 5.10 percent of BlackRock, Inc.'s outstanding common stock according to BlackRock, Inc.'s 2019 Proxy Statement at 43 (Apr. 12, 2019), available at <http://ir.blackrock.com/annual-reports-and-proxy-statements>.

The PNC Financial Services Group, Inc.

Information regarding individuals or entities directly holding an attributable interest in The PNC Financial Services Group, Inc., which indirectly holds an attributable interest in Invesco Ltd.⁹

Name	Address	Citizenship (individual) or place of organization (entity)
Joseph Alvarado	The Tower at PNC Plaza 300 Fifth Avenue Pittsburgh, PA 15222	
Charles E. Bunch	The Tower at PNC Plaza 300 Fifth Avenue Pittsburgh, PA 15222	
Debra A. Cafaro	The Tower at PNC Plaza 300 Fifth Avenue Pittsburgh, PA 15222	
Marjorie Rodgers Cheshire	The Tower at PNC Plaza 300 Fifth Avenue Pittsburgh, PA 15222	
William S. Demchak	The Tower at PNC Plaza 300 Fifth Avenue Pittsburgh, PA 15222	
Andrew T. Feldstein	The Tower at PNC Plaza 300 Fifth Avenue Pittsburgh, PA 15222	
Richard J. Harshman	The Tower at PNC Plaza 300 Fifth Avenue Pittsburgh, PA 15222	
Daniel R. Hesse	The Tower at PNC Plaza 300 Fifth Avenue Pittsburgh, PA 15222	
Richard B. Kelson	The Tower at PNC Plaza 300 Fifth Avenue Pittsburgh, PA 15222	
Linda R. Medler	The Tower at PNC Plaza 300 Fifth Avenue Pittsburgh, PA 15222	
Martin Pfinsgraff	The Tower at PNC Plaza 300 Fifth Avenue Pittsburgh, PA 15222	
Toni Townes-Whitley	The Tower at PNC Plaza 300 Fifth Avenue Pittsburgh, PA 15222	
Michael J. Ward	The Tower at PNC Plaza 300 Fifth Avenue Pittsburgh, PA 15222	
Robert Q. Reilly	The Tower at PNC Plaza 300 Fifth Avenue Pittsburgh, PA 15222	

⁹ Information about The PNC Financial Services Group, Inc.'s directors and officers obtained from <http://phx.corporate-ir.net/phoenix.zhtml?c=107246&p=irol-govboard> and <https://www.pnc.com/en/about-pnc/company-profile/leadership-team.html>, which do not report citizenship information.

Name	Address	Citizenship (individual) or place of organization (entity)
Vicki Henn	The Tower at PNC Plaza 300 Fifth Avenue Pittsburgh, PA 15222	
Gregory B. Jordan	The Tower at PNC Plaza 300 Fifth Avenue Pittsburgh, PA 15222	
Stacy M. Juchno	The Tower at PNC Plaza 300 Fifth Avenue Pittsburgh, PA 15222	
Karen L. Larrimer	The Tower at PNC Plaza 300 Fifth Avenue Pittsburgh, PA 15222	
Michael P. Lyons	The Tower at PNC Plaza 300 Fifth Avenue Pittsburgh, PA 15222	
E. William Parsley III	The Tower at PNC Plaza 300 Fifth Avenue Pittsburgh, PA 15222	
Joseph E. Rockley	The Tower at PNC Plaza 300 Fifth Avenue Pittsburgh, PA 15222	
Steven Van Wyk	The Tower at PNC Plaza 300 Fifth Avenue Pittsburgh, PA 15222	
BlackRock, Inc. ¹⁰	55 East 52 nd Street New York, NY 10055	United States (Delaware)
Capital World Investors ¹¹	333 South Hope Street 55th Floor Los Angeles, CA 90071	United States (Delaware)
The Vanguard Group, Inc. ¹²	100 Vanguard Boulevard Malvern, PA 19355	United States (Pennsylvania)
Wellington Management Group LLP ¹³	c/o Wellington Management Company LLP 280 Congress Street Boston, MA 02210	United States (Massachusetts)

¹⁰ As of December 31, 2018, BlackRock, Inc. beneficially owned 6.0 percent of the common stock of The PNC Financial Services Group, Inc. according to PNC's Schedule 14A filed with the Securities and Exchange Commission on March 12, 2019.

¹¹ As of December 31, 2018, Capital World Investors beneficially owned 5.4 percent of the common stock of The PNC Financial Services Group, Inc. according to PNC's Schedule 14A filed with the Securities and Exchange Commission on March 12, 2019.

¹² As of December 31, 2018, The Vanguard Group, Inc. beneficially owned 7.3 percent of the common stock of The PNC Financial Services Group, Inc. according to PNC's Schedule 14A filed with the Securities and Exchange Commission on March 12, 2019.

¹³ As of December 31, 2018, Wellington Management Group LLP beneficially owned 6.3 percent of the common stock of The PNC Financial Services Group, Inc. according to PNC's Schedule 14A filed with the Securities and Exchange Commission on March 12, 2019.

Capital World Investors

Information regarding individuals or entities directly holding an attributable interest in Capital World Investors, which indirectly holds an attributable interest in Invesco Ltd.¹⁴

Name	Address	Citizenship (individual) or place of organization (entity)
Timothy D. Armour	333 South Hope Street 55th Floor Los Angeles, CA 90071	
Robert W. Lovelace	333 South Hope Street 55th Floor Los Angeles, CA 90071	
Carmelo Spinella	333 South Hope Street 55th Floor Los Angeles, CA 90071	
James P. Ryan	333 South Hope Street 55th Floor Los Angeles, CA 90071	
Donald D. O’Neal	333 South Hope Street 55th Floor Los Angeles, CA 90071	
John H. Smet	333 South Hope Street 55th Floor Los Angeles, CA 90071	
Michael Cohen	333 South Hope Street 55th Floor Los Angeles, CA 90071	
Joyce E. Gordon	333 South Hope Street 55th Floor Los Angeles, CA 90071	
Bruce E. Meikle	333 South Hope Street 55th Floor Los Angeles, CA 90071	
Matthew P. O’Connor	333 South Hope Street 55th Floor Los Angeles, CA 90071	
Paul F. Royce	333 South Hope Street 55th Floor Los Angeles, CA 90071	
Gregory D. Johnson	333 South Hope Street 55th Floor Los Angeles, CA 90071	
Steven Guida	333 South Hope Street 55th Floor Los Angeles, CA 90071	
Julie St. John	333 South Hope Street 55th Floor	

¹⁴ According to the Capital World Investors’ Schedule 13G (PNC Financial Services Group, Incorporated) filed with the Securities and Exchange Commission on February 14, 2019, it is a division of a corporation, Capital Research and Management Company. This table lists information about the executive officers of Capital Research and Management Company which was obtained from its Form ADV filed with the Securities and Exchange Commission on April 25, 2019, and which does not report citizenship information.

Name	Address	Citizenship (individual) or place of organization (entity)
	Los Angeles, CA 90071	
Alan N. Berro	333 South Hope Street 55th Floor Los Angeles, CA 90071	
Diana Wagner	333 South Hope Street 55th Floor Los Angeles, CA 90071	
John M. Renfro	333 South Hope Street 55th Floor Los Angeles, CA 90071	
Herbert Y. Poon	333 South Hope Street 55th Floor Los Angeles, CA 90071	
Carl M. Kawaja	333 South Hope Street 55th Floor Los Angeles, CA 90071	
Michael C. Gitlin	333 South Hope Street 55th Floor Los Angeles, CA 90071	
David K. Hummelberg	333 South Hope Street 55th Floor Los Angeles, CA 90071	
Robert C. Klausner	333 South Hope Street 55th Floor Los Angeles, CA 90071	
Simon Mendelson	333 South Hope Street 55th Floor Los Angeles, CA 90071	
Chad M. Rach	333 South Hope Street 55th Floor Los Angeles, CA 90071	
Michael J. Triessl	333 South Hope Street 55th Floor Los Angeles, CA 90071	
Philip de Toledo	333 South Hope Street 55th Floor Los Angeles, CA 90071	
Christopher Thomsen	333 South Hope Street 55th Floor Los Angeles, CA 90071	
The Capital Group Companies, Inc.	333 South Hope Street 55th Floor Los Angeles, CA 90071	United States (Delaware)

The Capital Group Companies, Inc.

Information regarding individuals or entities directly holding an attributable interest in The Capital Group Companies, which indirectly holds an attributable interest in Invesco Ltd.¹⁵

Name	Address	Citizenship (individual) or place of organization (entity)
Tim Armour	333 South Hope Street 55th Floor Los Angeles, CA 90071	
Noriko Chen	333 South Hope Street 55th Floor Los Angeles, CA 90071	
Phil de Toledo	333 South Hope Street 55th Floor Los Angeles, CA 90071	
Mike Gitlin	333 South Hope Street 55th Floor Los Angeles, CA 90071	
Jody Jonsson	333 South Hope Street 55th Floor Los Angeles, CA 90071	
Rob Lovelace	333 South Hope Street 55th Floor Los Angeles, CA 90071	
Matt O'Connor	333 South Hope Street 55th Floor Los Angeles, CA 90071	
Martin Romo	333 South Hope Street 55th Floor Los Angeles, CA 90071	
Brad Vogt	333 South Hope Street 55th Floor Los Angeles, CA 90071	

Wellington Management Group LLP

Information regarding Wellington Management Group LLP, which indirectly holds an attributable interest in Invesco Ltd.

The Wellington Management Company LLP Form ADV filed with the Securities and Exchange Commission on March 29, 2019 reports that Wellington Management Group LLP “is a Massachusetts, USA, limited liability partnership, privately held by 168 partners, all fully active in the business of the firm. No single partner owns or has the right to vote more than 5% of the firm’s capital.”

¹⁵ Information about the management of The Capital Group Companies, Inc. obtained from <https://www.capitalgroup.com/our-company/management-team.html>, which does not report citizenship information. The Capital Group Companies, Inc. is privately held, so we do not have information about whether there are any other attributable shareholders.

EXHIBIT G

CERTIFICATION

I, Paul McNicol, am the Executive Vice President, General Counsel, and Secretary of iHeartMedia, Inc. ("iHeart"), and am an authorized officer of iHeart. I hereby certify, to the best of my knowledge, information, and belief, that:

1. All information contained in the foregoing Petition for Declaratory Ruling is true and correct.

2. The ownership interests disclosed in the Petition have been calculated based upon a review of the Commission's rules and the interests disclosed satisfy each of the pertinent standards and criteria set forth in the rules.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on July 25, 2019